UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

MAR - 1 2006

BY FACSIMILE & U.S. Mail

P. Stephen Finn
Chemical Engineer
Project Coordinator
Golder Associates Inc.
1951 Old Cuthbert Road, Suite 301
Cherry Hill, New Jersey 08034

Re: Review of the Addendum Remedial Investigation/Feasibility Study Work Plan
Lightman Drum Company Site, Winslow Township, New Jersey

Dear Mr. Finn:

The United States Environmental Protection Agency (EPA) has completed its review of the Addendum Remedial Investigation/Feasibility Study Work Plan for the Lightman Drum Company Superfund Site, dated December 7, 2005, prepared by Golder Associates Inc. for the Lightman Yard PRP Group.

Enclosed please find EPA's comments on the Work Plan. The Work Plan is approved provided all comments are addressed in a revised Work Plan. Please submit a revised Addendum Work Plan within fourteen days from the date of your receipt of this letter.

Should you have any questions, or need to discuss any of the comments attached, please feel free to contact Ms. Tanya Mitchell, of my staff at (212) 637-4362.

Sincerely yours,

Carole Petersen, Chief
New Jersey Remediadtion Branch

cc: James DeNoble, New Jersey Department of Environmental Protection
Sharon Budney, CDM Federal Programs Corporation

Addendum Remedial Investigation/Feasibility Study Work Plan Comments
Lightman Drum Company Site, Winslow Township, New Jersey
February 28, 2006

1. Identify all analytical methods within the footnotes for Table 1.

2. Section 2.2, first paragraph - Identify what section in the Sampling and Analysis Plan (SAP) the core sample screening with the photoionization detector (PID) is described.

3. Section 2.2, second paragraph - If headspace readings will be measured during extreme temperature conditions, consider allowing the samples to equilibrate in a temperature controlled environment to obtain representative and consistent headspace VOC measurements.

4. Section 2.2 - in the November 2005 letter to Golder from EPA regarding the review of the Site Characterization Summary Report, it was recommended that the soil samples screened for NAPL should also be verified using a UV lamp. Indicate whether or not this will be done.

5. Section 2.3, second sentence - Please explain the rational for collection of the Target Analyte List (TAL) metals samples that are most impacted by VOCs.

6. Section 3.0 - when making references to the SAP please identify which sections are being referred to.

7. Section 3.0, second paragraph - Analysis for 1, 4-dioxane was not originally included in the SAP. Include the analytical method that will be used to analyze for 1, 4-dioxane in groundwater.

8. Section 3.0 - In Section A.2.6.1.1 of the SAP, groundwater samples were also required to be analyzed for 1, 2-diphenylhydrazine and benzidine. Please indicate why these samples will no longer be analyzed for these parameters.

9. CLP analytical methods listed in the SAP have not been updated. Clarify if the current CLP methods (OLM04.3 and ILM05.3) will be used.

10. Analysis for 1, 4-dioxane (groundwater and soil), updated CLP methods (if applicable) and use of NAPL field screening (soil) were not included in the original SAP. Provide collection requirements, holding times, quality assurance/quality control samples, sample shipping, and other analysis requirements for samples that will be collected under this Addendum. Update the following tables from the SAP to include this additional sampling and analysis:

Table A-2 Proposed Remedial Investigation and Data Quality Objectives

Table A-3 PARCC Data for Aqueous Samples
Table A-4 Laboratory Precision and Accuracy Criteria for Aqueous TCL/TAL Samples
Table A-5 PARCC Data for Soil Samples
Table A-6 Laboratory Precision and Accuracy Criteria for Soil TCL/TAL Samples
Table A-8 Analytical Methods, Sample Containers, Preservation and Analytical Hold Times for Aqueous Samples
Table A-9 Analytical Methods, Sample Containers, Preservation and Analytical Hold Times for Soil Samples

11. Section 4.0 - Indicate if operational data (flow, operational times, draw down, etc.) for the municipal wells located downgradient from the site is available and to what level of detail it is recorded (to the day, hour or minute). If this data is not readily available, indicate how the municipal wells will be monitored during the two week period to correlate the data collected in MW-18.

12. Section 4.0 - Include a reference to procedures for collection of manual water levels in Section A.2.8.1 of the SAP. Procedures for collection of water levels using an In-Situ TROLL™ transducer/datalogger are not included in the SAP and will need to be included. In addition, a reference to the decontamination procedures and instrument calibration and frequency will need to be added for the In-Situ TROLL™ transducer/ datalogger.

13. Section 4.0 - In the Request for Clarification of Agency Comments Site Characterization Report (December 16, 2005), Specific Comment No. 30, it was stated that additional dataloggers may be subsequently considered for longer term water level measurements based on the initial results. Provide the rational that will be used to determine whether or not additional wells will be monitored.

14. Section 5.0 - Include the expected duration of the field program for this Addendum to the Work Plan.

15. Table 1 - Reporting limits should be compared against the screening criteria that will be used for the site to show that all reporting limits meet proposed screening criteria. Include the screening criteria on Table 1.

16. Figure 1 - Include monitoring well locations on the figure. Section 2.1 text indicates the borings should be located near monitoring wells MW-2A/2B and MW-8A/8B. It is difficult to tell where the borings are placed in reference to the wells when they are not shown on the figure.

17. Figure 2 - The location of the municipal wells located downgradient of the site should be shown on Figure 2. Add the boundaries of the former southwest drum storage area. Indicate the boundaries of the former waste storage tank area and unlined pit area. The current figure shows the former waste storage tank area located next to the background well.