



**U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 2**

April 2, 2019

BY ELECTRONIC MAIL

Robert Law, Ph.D.  
de maximis, inc.  
186 Center Street, Suite 290  
Clinton, New Jersey 08809

Re: Re: Lower Passaic River Study Area – Administrative Settlement Agreement and Order on Consent for Remedial Investigation/Feasibility Study (Agreement) CERCLA Docket No. 02-2007-2009

Dear Dr. Law:

The U.S. Environmental Protection Agency (EPA) has reviewed the Cooperating Parties Group's (CPG) DRAFT Lower Passaic River Study Area Upper 9-Mile Interim Remedy Feasibility Study – *Technology Screening Table* dated March 4, 2019.

EPA is providing the enclosed comments on the CPG's *Technology Screening Table* with this letter in accordance with Section X, Paragraph 44(d) of the Agreement. Please proceed with revisions to the table within 30 days consistent with the enclosed comments. If there are any questions or clarifications needed, please contact me to discuss.

Sincerely,

A handwritten signature in black ink, appearing to read "Diane Salkie".

Diane Salkie, Remedial Project Manager  
Lower Passaic River Study Area RI/FS

Enclosure

Cc: Zizila, F. (EPA)  
Sivak, M. (EPA)  
Hyatt, B. (CPG)  
Potter, W. (CPG)

**EPA COMMENTS**

**DRAFT Lower Passaic River Study Area Upper 9-Mile Interim Remedy Feasibility Study – Technology Screening Table dated March 4, 2019**

<b>No.</b>	<b>Section</b>	<b>General or Specific</b>	<b>Page No.</b>	<b>Comment</b>
1	Institutional Controls	Specific	1	The three items in process options (POs) should be moved to technology types (TTs). Process option examples to include are, but are not limited to, commercial fishing bans (TT – government control), land use restrictions (TT – proprietary control), and fish consumption advisories (informational devices).
2	Monitoring	Specific	1	Baseline and Long-term monitoring may be grouped under Monitoring. However, construction monitoring and operation, maintenance and monitoring may be different for different TTs/POs. Therefore, these monitoring components should be removed from the Monitoring General Response Action (GRA) and included, where appropriate, in the specific TT/PO for sediment treatment, containment, removal, transport, and disposal. Also, under implementability, a note should be added that long-term monitoring would have overlap with monitored natural recovery (MNR), this note would be complementary to the note in MNR.
3	Natural Recovery	Specific	1	Clarify if the term “residual” under MNR effectiveness is intended to refer specifically to dredge residuals or is being used in another more general context.
4	Natural Recovery	Specific	1	Enhanced natural recovery (ENR) effectiveness notes that granular activated carbon (GAC) can be used to improve effectiveness under piers, etc. This would appear to be a similar approach as outlined in <i>In-situ</i> treatment effectiveness. Clarify how a thin layer placement with GAC would be different from a carbon-based in-situ treatment amendment.
5	<i>In situ</i> and <i>Ex situ</i> treatment	Specific	1 and 2	<i>In-situ</i> and <i>Ex situ</i> treatment should be identified as GRAs, then the TTs should be identified, as appropriate, as Physical, Chemical, or Thermal.
6	<i>In situ</i> treatment	Specific	1	<i>In situ</i> treatment technologies have not been demonstrated successfully in the LPR. Therefore, under Implementability, the phrase “including the LPR” should be deleted. (NJDEP Comment)
7	Soil/sediment washing	Specific	1	Soil/sediment washing may be applicable to fine-grained sediment and this PO should be retained for further evaluation. The lower 8 Focused Feasibility Study (FFS) retained the PO for consideration.
8	Sediment treatment and beneficial reuse	Specific	1	The Beneficial Use (not reuse) should be a separate GRA. Three POs to screen are Sanitary Landfill Cover, Construction Fill and Mine Lands Restoration. Also, elsewhere in the table, replace “beneficial reuse” with “beneficial use”.
9	Incineration	Specific	2	The table identifies incineration as an “effective option to destroy organic contaminants.” Expand the discussion to include the effectiveness on metals and considerations of dealing with metals contaminants in sediments.
10	Conventional sand cap	Specific	2	Use the PO term “Engineered Cap” instead of “Conventional sand cap”, which is consistent with the Lower 8 FFS. Armored Cap and Geotextile Cap should be added POs. This list of POs, in addition to Reactive cap PO already in the table, is consistent with the lower 8 FFS. Also, a TT identified as Backfill could also be added with the PO identified as Backfill if this TT/PO is necessary to be in the FS to account for the interim remedial action concepts of the CPG.
11	Sediment Removal	Specific	3	Specialty dredging should be added as a PO for dredging. This PO should be added to account for the challenging areas that will be remediated as discussed in FS Meeting #12 on February 28, 2019.
12	Supporting Technologies	Specific	3	The supporting (or ancillary) technologies should be removed from the table but remain in the FS. The ancillary technologies should be discussed in the FS as they relate to the primary technologies of the table. Also, in addition to dewatering, water treatment, and dredge residuals management (also referred to as sediment dispersion control) identified in the table, the list of ancillary technologies should be expanded to include transportation (of material away from the site) and restoration. Within these five technologies types, process options should be presented and discussed in the FS (not the table).
13	Confined disposal facility	Specific	3	The NJDEP has indicated they are opposed to the use of a confined disposal facility (CDF) or a confined aquatic disposal (CAD) cell as a disposal technology. The CDF process option was not retained in the technology screening in the lower 8 FFS, while the CAD process option was retained. The CPG should add language to the table to note the NJDEP’s opposition and the CDF process option not being retained in the lower 8 FFS. (NJDEP Comment)
14	Footnote “a”	Specific	4	The column notes if the process option was “Retained” or “Retained for further evaluation” and based on footnote “a” used in the column, “Retained for further evaluation” indicates the process option may be considered in the design. The definition of the footnote should be revised to also note that “Retained” indicates the process option is the representative process option to be used in the FS.