



U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 2

August 08, 2019

BY ELECTRONIC MAIL

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

Re: Re: Diamond Alkali OU4 - 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) reviewed the *Current Conditions Monitoring Program Small Volume Chemical Water Column Monitoring Quality Assurance Project Plan/Field Sampling Addendum (QAPP/FSP Addendum), LPRSA RI/FS Project, July 2019* prepared by Anchor QEA on behalf of the Cooperating Parties Group (CPG) for the Lower Passaic River Study Area (LPRSA) Remedial Investigation (RI)/Feasibility Study (FS).

In accordance with Section X, Paragraph 44(d) of the Agreement, EPA has enclosed an evaluation of CPG's *draft QAPP/FSP Addendum* with this letter. Please proceed with revisions consistent with the enclosed comment evaluations. If there are any questions or clarifications needed on EPA's enclosed comment evaluations, 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 Current Conditions Monitoring Program Small Volume Chemical Water Column Monitoring Quality Assurance Project Plan/Field Sampling Plan, dated July 2019

No.	Section	General or Specific	Page No.	Comment
1	N/A	General	N/A	Physical Water Column Monitoring (PWCM) samples are being collected at the 2, 4, and 6 transect locations. Please provide an explanation for why the Chemical Water Column Monitoring (CWCM) samples are only collected from the center (position 4) location of the transect.
2	N/A	General	N/A	Please explain why there is value in collecting suspended solids concentration (SSC), particulate organic carbon (POC), and dissolved organic carbon (DOC) during the CWCM event when they will also be collected during overlapping PWCM events. Or, clarify that there will not be duplicated effort between these two programs.
3	N/A	General	N/A	For some analytes, such as copper and lead, both the Inductively Coupled Plasma/Atomic Emission Spectroscopy (ICP/AES) and Inductively Coupled Plasma/Mass Spectrometry (ICP/MS) methods are listed. Please clarify what conditions will dictate which method will be used.
4	N/A	General	N/A	Please define “EDL,” which is referenced in several locations, including QAPP Worksheet 15.
5	N/A	General	N/A	Please confirm whether the 2019 Health and Safety Plan (HASP) as referenced in this QAPP has been uploaded to the Passaic River SharePoint site. If the HASP has not been posted please do so.
6	1.3 – Summary of Activities	Specific	4	There is an extra comma in the list of analyses. Please confirm whether the list of analyses is complete, and delete the comma, as necessary.
7	QAPP Worksheet 7	Specific	20	First row, change “PWCM” to “CWCM”
8	QAPP Worksheet 14	Specific	49	First paragraph, final sentence is missing words, presumed to be “HV CWCM QAPP.” Please revise.
9	QAPP Worksheet 15	Specific	55	PCB 124 is missing a quantitation limit (QL) in the far-right column. Please revise
10	QAPP Worksheet 15	Specific	59-61	Some analytes, such as lead, DOC, and alkalinity, have project QLs below the achievable laboratory QLs. Please check all analyses in QAPP Worksheet 15 and revise accordingly.
11	QAPP Worksheet 15	Specific	60-61	The QLs presented for SSC, POC, and DOC differ from those presented in the PWCM QAPP. Please explain the discrepancy and/or revise accordingly.
12	QAPP Worksheet 15	Specific	63	Please bold analytes where achievable laboratory QLs exceed project action limits (PALs), as described in note “e.”