



U.S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL

Catalyst for Improving the Environment

Evaluation Report

Independent Sampling Generally Confirms EPA's Data at the Jones Sanitation Superfund Site in New York

Report No. 09-P-0243

September 23, 2009



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Abbreviations

EPA	U.S. Environmental Protection Agency
OIG	Office of Inspector General
NYSDOH	New York State Department of Health
NYSWQS	New York State Water Quality Standard
ROD	Record of Decision
Site	Jones Sanitation Superfund Site
VOCs	Volatile Organic Compounds

Cover photo: A stream runs along the southeast side of capped area at the Jones Sanitation Superfund Site (photo by EPA OIG).



At a Glance

Catalyst for Improving the Environment

Why We Did This Review

The Office of Inspector General (OIG) is testing long-term monitoring results at Superfund sites the U.S. Environmental Protection Agency (EPA) has deleted from the National Priorities List. Jones Sanitation, located in Hyde Park, New York, is one of eight sites being reviewed.

Background

Jones Sanitation received and treated septic and industrial wastes containing hazardous substances. Remedial actions included consolidating and capping hazardous wastes. The Site was added to the National Priorities List in 1987 and was deleted 18 years later in 2005. Deletion signifies that EPA determined that clean-up goals had been achieved.

For further information, contact our Office of Congressional, Public Affairs and Management at (202) 566-2391.

To view the full report, click on the following link:
www.epa.gov/oig/reports/2009/20090923-09-P-0243.pdf

Independent Sampling Generally Confirms EPA's Data at the Jones Sanitation Superfund Site in New York

What We Found

In April 2008, the OIG obtained groundwater and surface water samples from the Jones Sanitation Superfund Site and nearby areas, and conducted a site inspection. Our independent sampling results were generally consistent with the sampling data that Region 2 has obtained historically. In addition, our site inspection showed the Site was properly maintained and secured, and is consistent with information Region 2 has obtained on the Site conditions.

Of the 113 chemical compounds that could be compared, Region 2 and OIG sampling results differed for only 11 compounds. OIG results for 7 of those 11 compounds exceeded applicable health standards. However, four of these seven compounds were contained within the Site boundaries and were, therefore, controlled by the remedy. In another case, a compound (lead) is not likely to have originated from the Site. Only sodium and nickel were found to exceed standards in the residential wells or potentially migrate off-site at levels above standards. Region 2 did not document a concern with these but concluded that the Site remedy remains protective to human health and the environment. Due to limitations in the Region's off-site monitoring activities, the Region needs to better document the rationale for its conclusions.

Region 2's lack of monitoring to determine whether nickel exceedances in the boundary monitoring well may be migrating off-site limits its ability to rule out the possible off-site migration of nickel exceedances. The Region's discontinuation of other off-site monitoring also limits its conclusions that sodium exceedances have no implications for the protectiveness of the Site remedy.

What We Recommend

We recommend that the Region 2 Regional Administrator demonstrate and document in an Addendum to the 2006 Five-Year Review that off-site migration of sodium, nickel, and any other compounds exceeding applicable standards are controlled at the Site. We also recommend that the Region modify and/or re-initiate some off-site monitoring if the Region determines it is needed to adequately support determinations of Site protectiveness. In its response to the draft report, EPA agreed with both of our recommendations and its proposed corrective actions should address our recommendations.



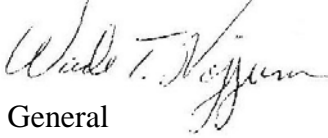
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
INSPECTOR GENERAL

September 23, 2009

MEMORANDUM

SUBJECT: Independent Sampling Generally Confirms EPA's Data at the
Jones Sanitation Superfund Site in New York
Report No. 09-P-0243

FROM: Wade T. Najjum 
Assistant Inspector General
Office of Program Evaluation

TO: George Pavlou
Acting Regional Administrator, Region 2

This is our report on the subject evaluation conducted by the Office of Inspector General (OIG) of the U.S. Environmental Protection Agency (EPA). This report contains the findings from our sampling at the Jones Sanitation Superfund Site and corrective actions the OIG recommends. EPA Region 2 concurred with and provided comments on the recommendations of the draft report. This report represents the opinion of the OIG and does not necessarily represent the final EPA position. Final determinations on matters in this report will be made by EPA managers in accordance with established resolution procedures.

The estimated cost of this report – calculated by multiplying the project's staff days by the applicable daily full cost billing rates in effect at the time, then adding in the contractor costs – is \$568,898.

Action Required

In accordance with EPA Manual 2750, you are required to provide a written response to this report within 90 calendar days. You should include a corrective action plan for agreed upon actions, including milestone dates. We have no objections to the further release of this report to the public. This report will be available at <http://www.epa.gov/oig>.

If you or your staff have any questions regarding this report, please contact Carolyn Copper, Director for Program Evaluation, Hazardous Waste Issues, at (202) 566-0829 or copper.carolyn@epa.gov; or Patrick Milligan, Project Manager, at (215) 814-2326 or milligan.patrick@epa.gov.

Table of Contents

Purpose	1
Background	1
Noteworthy Achievements	1
Scope and Methodology	2
Results	2
Conclusions	4
Recommendations	5
EPA Region 2 Response and OIG Evaluation	5
Status of Recommendations and Potential Monetary Benefits	6

Appendices

A Details on Sampling Methodology and Data Analyses.....	7
B Compounds Exceeding Applicable Standards.....	9
C EPA Region 2 Response to Draft Report.....	10
D Distribution.....	12

Purpose

The Office of Inspector General (OIG) of the U.S. Environmental Protection Agency (EPA) is evaluating long-term monitoring at Superfund sites deleted from the National Priorities List. This is being done to ensure EPA has valid and reliable data on the conditions of these sites. Jones Sanitation Superfund Site in Hyde Park, New York, is one of eight sites being reviewed. To determine this at Jones Sanitation, we collected groundwater samples and compared our results to historical results collected by the Site's responsible party, which are used by EPA to make a protectiveness determination. We also compared results to applicable federal and State standards, collected surface water samples, and conducted a site inspection.

Background

From approximately 1956 to 1990, Jones Sanitation received and treated septic and industrial wastes containing hazardous substances. The 57-acre Site has rolling and forested terrain with wetlands surrounding the property to the north, south, and west. The Site is located approximately 2 miles east of the Hudson River. Shallow groundwater flows from the Site's central disposal area toward the wetlands and surface water streams, which discharge to the Hudson River. The Site is used commercially but the surrounding area includes both residential and undeveloped land.

Monitoring wells were installed on-site to monitor the quality and flow of the groundwater. Pre-existing and off-site residential drinking water wells in the proximity of the Site were monitored to ensure that Site-related contaminants were not impacting the local drinking water sources. During the first year of long-term monitoring, on-site monitoring wells were sampled quarterly and off-site residential wells were sampled annually. In later years, in accordance with the Site's Record of Decision (ROD), the on-site sampling frequency was reduced to an annual event. EPA Region 2 deleted the Site from the National Priorities List in September 2005 because the Region determined that responsible parties or other parties have implemented all appropriate response actions required and the Site does not pose a significant threat to public health or the environment. In 2006, Region 2 concluded during its Five-Year Review that the remedy continued to protect human health and the environment.

Noteworthy Achievements

Remedial construction was completed in 2001. Soils contaminated at levels above clean-up goals were excavated and moved to a central disposal area where a 4.8-acre cap was constructed over the contaminants. The capped area was fenced to limit access. A deed restriction was implemented that prohibits use of groundwater underlying the Site. An environmental easement also was put in place to prohibit development on the capped area. A long-term groundwater monitoring program was developed to monitor the effectiveness of the remedy in preventing off-site migration of the contaminated groundwater. Region 2 completed the first Five-Year Review for the Site in 2006 as required by statute.

Scope and Methodology

We conducted our work from March 2008 to September 2009 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the evaluation to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our evaluation objectives. We reviewed key historic documents, including past sampling results and decision documents, such as the ROD and Five-Year Review. We also interviewed the project managers from Region 2 and the New York State Department of Environmental Conservation. We collected groundwater and surface water samples and conducted a limited site inspection.

We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our evaluation objectives. This report summarizes OIG's comparison of our Site data to Region 2's historical Site data and to applicable federal and State standards. This report also compares OIG's observations during the site inspection with historical observations reported to EPA by the Site's responsible party.

For this review, we acquired a qualified environmental contractor to take water samples and conduct a site inspection. The contractor collected samples from 10 on-site monitoring wells, 3 off-site residential wells, and 4 surface water locations. OIG staff members were present to ensure that proper sampling and site inspection quality assurance protocols were followed. We analyzed our sampling data from the Site to determine whether Region 2 has been obtaining valid and reliable data on the conditions at the Site. We also evaluated our results in the context of applicable standards and their potential effect on Region 2's protectiveness determination for the Site. Details on our sampling methodology and data analyses are in Appendix A. OIG sampling results that relate to issues discussed in this report are in Appendix B.

We plan to report additional findings on issues beyond the results of our sampling analysis from all or some of the eight sites we evaluated. The summary report may include additional findings from Jones Sanitation.

A draft of this report was sent to the Acting Region 2 Administrator on September 3, 2009, and we received comments from Region 2 on September 17, 2009. Region 2's written comments to the draft report are in Appendix C.

Results

OIG's independent sampling and analyses generally confirm Region 2's data at the Jones Sanitation Superfund Site. Out of more than 100 compounds analyzed, 11 were found to have real differences from historical data. OIG results greater than two standard deviations above average historical concentrations were deemed to have real differences from the historical data. In addition, seven exceeded applicable standards. Four of these seven compounds exceeding standards were contained within the Site boundaries and, therefore, controlled by the remedy. Two compounds – sodium and nickel – exceeded applicable standards in the off-site or boundary wells. Off-site monitoring had been limited in scope and was subsequently discontinued. We

did not find any documentation regarding nickel and sodium exceedances, and whether there was an impact on the protectiveness of the remedy.

Groundwater

Our sampling results were generally consistent with Region 2's historical results. Out of the 113 compounds for which EPA had sufficient data to compare, we identified 11 compounds that had different concentrations from historical results (see Table 1, Part A). Eight of these either had no standards or were detected at concentrations that were below applicable health standards.

Concentrations of the other three compounds – manganese, sodium, and lead – were different from Region 2's historical data and exceeded applicable standards. In addition, four other compounds – benzene, chlorobenzene, iron and nickel – had groundwater concentrations above applicable standards, although our results were similar to the historical data (see Table 1, Part B).

Manganese, benzene, chlorobenzene and iron concentrations exceeded standards, but were only detected within the interior of the Site near the cap.

The off-Site residential and on-Site monitoring wells located along the Site boundary indicated that the levels of these compounds were below standards. Historical results for these off-site residential and on-site boundary wells were consistent with OIG results. Under Region 2's definition of protectiveness for the Site, these on-site exceedances are not a concern.

Sodium exceeded the New York State groundwater standard at several locations, including the three off-site residential wells. Sodium exceedances had also been reported historically. Although Region 2 reports in its 2006 Five-Year Review that sodium at and around the Site is due to natural background levels, OIG and historical concentrations were greater than the background levels. The OIG notified the affected residents, Region 2 staff, and staff at the New York State Department of Health of the sodium exceedance.

Lead exceeded the federal drinking water standard at one off-site residential well. Lead was not detected in the on-site groundwater monitoring well located between the capped area and the residence. As a result, the lead exceedance at the residence may not be associated with the Site

Table 1 – Summary of Data Differences and OIG Results that Exceeded Standards

Part A – OIG Groundwater Results Compared to Region 2 Data
<ul style="list-style-type: none"> • 113 Compounds with historical data available for comparison: <ul style="list-style-type: none"> • 102 Compounds without Real Differences (Not Listed) • 11 Compounds with Real Differences: <ul style="list-style-type: none"> • 8 Detected without or below Standards (Acetone, Calcium, Chloroform, Copper, Magnesium, Methyl tert-butyl ether, Potassium, Zinc) • 3 Detected above Standards – Further evaluated below (Manganese, Sodium, Lead)
Part B – OIG Groundwater Results Compared to Standards
<ul style="list-style-type: none"> • 120 Compounds Analyzed by OIG: <ul style="list-style-type: none"> • 113 Compounds detected below relevant standards (Not Listed) • 7 Compounds exceeded relevant standards: <ul style="list-style-type: none"> • 3 Compounds also found to be different from historical data - from above (Lead, Manganese, Sodium) • 4 Compounds found to be similar to historical data (Iron, Benzene, Chlorobenzene, Nickel)

Source: OIG sampling data and analyses

and may be attributed to lead material in the residential plumbing. We informed Region 2 of the lead exceedance and Region 2 notified the affected residents.

Nickel consistently exceeded the New York State groundwater standard at a Site boundary well in both OIG and historical samples. In the 2006 Five-Year Review, Region 2 cited past nickel exceedances at an on-site boundary well but did not address the likelihood of nickel migrating off the Site at concentrations exceeding the standard. If nickel is migrating off-site at levels above the standard, it may negatively impact the Region's current protectiveness determination for the Site remedy.

In 2007, EPA discontinued off-site sampling because it claimed data indicated that contaminants had not migrated off-site in the past. Based on the sodium and nickel exceedances, we believe Region 2 should reassess whether its decision to discontinue off-site monitoring was appropriate and additional or modified off-site sampling is needed. On-site monitoring alone provides limited assurance that contaminants are not migrating off-site. That is particularly true when on-site boundary wells have consistently shown exceedances.

Surface Water

Our results for surface water did not exceed any of the applicable surface water standards. If contaminated groundwater was discharging to on-site streams, our sampling indicated that the magnitude of the discharge was not great enough to be detected above standards.

Site Inspection

We observed in April 2008 that the area over the cap was well maintained. The landfill cover showed no signs of erosion, cracking, or stress. The chain link fence surrounding the cap was intact with a warning sign in place. Our observations were consistent with the historical observations reported to Region 2 by the Site's responsible party.

Conclusions

Our independent sampling results were generally consistent with the sampling data that Region 2 has obtained historically. Two compounds (sodium and nickel) have historically exceeded standards off-site or at the Site boundary. The Region has limited and discontinued off-site monitoring. In addition, the Region has not sufficiently documented its conclusions that these exceedances have no adverse implications for the remedy's protectiveness. The Region's conclusion that the Site remedy remains protective of human health and the environment will be better supported and transparent by evaluating and documenting the implications of these exceedances and the potential need for changes or modifications in off-site monitoring activities.

Recommendations

We recommend that the Region 2 Regional Administrator:

1. Demonstrate and document in an Addendum to the 2006 Five-Year Review that off-site migration of sodium, nickel, and any other compounds exceeding applicable standards are controlled at the Site.
2. Modify and/or re-initiate some off-site monitoring if the Region determines it is needed to adequately support determinations of Site protectiveness.

EPA Region 2 Response and OIG Evaluation

Region 2 agreed with both OIG recommendations and its proposed corrective actions should address our recommendations. Appendix C provides the full text of the Region's comments.

Regarding Recommendation 1, Region 2 agrees and stated it will issue an Addendum to the 2006 Five-Year Review within 90 days. This Addendum will clarify that site-related contaminants are controlled at the Site and that the remedy remains protective of human health and the environment, even though concentrations of nickel in one monitoring well exceed the New York State water quality standards for groundwater, and concentrations of sodium in some wells exceed levels intended to protect people on severely restricted sodium diets.

Regarding Recommendation 2, Region 2 concurs and will continue to evaluate its monitoring program at the Site. If the Region determines that the monitoring program needs to be modified to support determinations of Site protectiveness, it will take appropriate action at that time.

Status of Recommendations and Potential Monetary Benefits

RECOMMENDATIONS						POTENTIAL MONETARY BENEFITS (in \$000s)	
Rec. No.	Page No.	Subject	Status ¹	Action Official	Planned Completion Date	Claimed Amount	Agreed To Amount
1	5	Demonstrate and document in an Addendum to the 2006 Five-Year Review that off-site migration of sodium, nickel, and any other compounds exceeding applicable standards are controlled at the Site.	O	Regional Administrator, Region 2			
2	5	Modify and/or re-initiate some off-site monitoring if the Region determines it is needed to adequately support determinations of Site protectiveness.	O	Regional Administrator, Region 2			

¹ O = recommendation is open with agreed-to corrective actions pending
C = recommendation is closed with all agreed-to actions completed
U = recommendation is undecided with resolution efforts in progress

Appendix A

Details on Sampling Methodology and Data Analyses

Sampling Methodology

We acquired a qualified environmental contractor from the list of General Services Administration contractors to take water samples and conduct a site inspection. During April 21-24, 2008, our contractor collected samples from 10 on-site monitoring wells, 3 off-site residential wells, and 4 surface water locations. The samples were analyzed for volatile organic compounds (VOCs) and metals at a qualified laboratory using EPA-approved methods. Surface water samples were also analyzed for nutrients. OIG staff members were present to ensure that proper sampling and site inspection quality assurance protocols were followed.

Groundwater Monitoring Wells

We sampled 10 on-site monitoring wells that are part of the annual monitoring at the Site. We followed the same sampling methods and protocols used in the Site's long-term monitoring program. We collected two sets of sample bottles from each well: one for our laboratory analysis and the other for purposes of quality assurance. VOC samples were collected first, followed by the total and dissolved metals samples.

Residential Drinking Water Wells

We sampled three off-site residential wells to determine any groundwater impact from the Site. In taking our samples, we followed the same protocols used in long-term monitoring. One set of sample bottles was collected for laboratory analysis. For two of the residences, we collected samples from the hose bibs closest to the well heads. We collected the third residential well sample from a kitchen faucet connected to a very small public drinking water system. Our sample collection points were consistent with historical collection points. Residential well samples were analyzed for VOCs and total metals. Due to the scope of the OIG evaluation, we did not analyze for all contaminants recommended for drinking water monitoring.

Surface Water Locations

We collected four surface water samples to determine whether contaminated groundwater was discharging to surface water. If our sampling results showed that surface water was contaminated, the Region would need to consider regularly sampling surface water to fully evaluate conditions at the Site. Historically, surface water sampling had not been part of the long-term monitoring program. As a result, a site-specific protocol for surface water sampling at this Site has not been established. We used generally accepted surface water sampling methods appropriate for initial screening of Site conditions. We collected samples by dipping a clean vessel into the center of the stream. In addition to VOCs and total metals, the surface water samples were assessed for three nutrients (nitrite, nitrate, and sulfate). A total of four surface

water samples were collected from the two on-site streams – two were taken within the Site near the capped disposal area and two where the streams leave the Site.

Data Analyses

We analyzed our sampling data from the Site to determine whether Region 2 has been obtaining valid and reliable data on the conditions at the Site. First, we compared our results to historical data spanning back to 2002 to determine whether our data was consistent with data Region 2 has been receiving from the Site's responsible party. OIG results greater than two standard deviations above average historical concentrations were deemed to have real differences from the historical data. We did not conduct an evaluation of the reasons for these differences.

We also evaluated our results in the context of applicable standards and their potential effect on Region 2's protectiveness determination for the Site. This required us to identify all OIG results that exceeded applicable standards as listed in the ROD. We compared our groundwater sampling results to federal drinking water and New York State groundwater standards, whichever was more stringent. Our approach and selection of applicable standards was fully consistent with the same standards applied by EPA. We also compared our surface water results to New York State surface water standards, as Region 2 had done prior to the Site remediation. Region 2 did not require surface water samples or specify the use of any surface water standards in the ROD because substantial contaminant concentrations had not been found in the surface water prior to remediation. Contaminant concentrations detected below applicable standards are not a concern because they do not adversely affect Region 2's protectiveness determination. Also, contaminant levels above standards but within the Site boundaries are not a concern, provided the contaminants are not migrating off-site at levels above the standards. This is consistent with the Region's definition of Site protectiveness, as stated in the ROD.

Appendix B

Compounds Exceeding Applicable Standards

Analyzed Compound	Sampling Location	Compound State	OIG Results	Applicable Standard
Manganese (mg/L)	JSMW-3A (Interior Well)	Dissolved	0.88	0.3 mg/L ¹
		Total	0.98	
	JSMW-3B (Interior Well)	Dissolved	1.4	
		Total	1.6	
	JSMW-8A (Interior Well)	Dissolved	1.7	
		Total	1.53	
JSMW-8B (Interior Well)	Dissolved	1.4		
	Total	1.3		
Sodium (mg/L)	32 Cardinal (Residential Well)	Total	38	20 mg/L ¹
	74 Cardinal (Residential Well)	Total	32	
	Valkill Lot #2 (Residential Well)	Total	30	
	JSMW-6B (Boundary Well)	Dissolved	98	
		Total	98	
	JSMW-8A (Interior Well)	Dissolved	24.2	
		Total	25	
	JSMW-8B (Interior Well)	Dissolved	57.5	
Total		53.5		
Lead (mg/L)	32 Cardinal (Residential Well)	Total	0.043	0.015 mg/L ²
Benzene (ug/L)	JSMW-3B (Interior Well)	---	1.72	1 ug/L ¹
	JSMW-8A (Interior Well)		1.13	
Chlorobenzene (ug/L)	JSMW-3B (Interior Well)	---	13.4	5 ug/L ¹
	JSMW-8A (Interior Well)		12.2	
Iron (mg/L)	JSMW-3A (Interior Well)	Dissolved	25.7	0.3 mg/L ¹
		Total	29.2	
	JSMW-3B (Interior Well)	Dissolved	5.4	
		Total	6.1	
	JSMW-8A (Interior Well)	Dissolved	6.04	
		Total	7.11	
JSMW-8B (Interior Well)	Dissolved	2.5		
	Total	3.4		
Nickel (mg/L)	JSMW-6B (Boundary Well)	Dissolved	0.54	0.1 mg/L ¹
		Total	0.72	

¹ New York State Groundwater Standard² Federal Drinking Water Maximum Contaminant Level or Action Level

mg/L: milligrams per liter

ug/L: micrograms per liter

Source: OIG sampling data and analyses

Appendix C***EPA Region 2 Response to Draft Report*****UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2**

DATE: September 17, 2009

SUBJECT: Region 2 Comments on OIG Draft Evaluation Report - Jones Sanitation

FROM: George Pavlou /s/
Acting Regional Administrator

TO: Carolyn Copper
Office of Inspector General

EPA Region 2 welcomes the opportunity to comment on the Office of the Inspector General's Draft Evaluation Report on the Jones Sanitation Superfund site.

Region 2's responses to the two recommendations in the draft report are as follows:

OIG Recommendation #1

"We recommend that the Region 2 Regional Administrator demonstrate and document in an Addendum to the 2006 Five-Year Review that off-site migration of sodium, nickel, and any other compounds exceeding applicable standards are controlled at the Site."

Region 2 Response

Region 2 concurs; Region 2 will issue an Addendum to the 2006 Five-Year Review within 90 days. This Addendum will clarify that site-related contaminants are controlled at the site and that the remedy remains protective of human health and the environment, even though concentrations of nickel in one monitoring well (site boundary well JSMW-6B) exceed the New York State water quality standards for groundwater (NYSWQS) for nickel, and concentrations of sodium in some wells exceed levels intended to protect people on severely restricted sodium diets.

The 2006 Five-Year Review correctly states that site-related contaminants are controlled at the site and that the remedy is protective. However, a reference to the presence of nickel above the NYSWQS, albeit in one well, is written in a manner that could lead the reader to question whether the remedy is in fact protective. The Addendum will clearly explain that although nickel is found at one boundary well

above the NYSWQS, the nickel concentrations found in this well, and all other on-site wells sampled since 2003, have been below human health risk based criteria. This one well has historically had levels of nickel above the NYSWQS, and there is some thought that these higher levels may be due to deterioration of the well screen. Nickel has never been found in any of the residential wells above the NYSWQS or health based levels. There are no Federal or New York State drinking water standards for nickel.

The Addendum will also better explain the relevance of the sodium concentrations that have been found in and around the site, even though sodium is present above the NYSWQS.

New York State standards for maximum levels of contaminants in drinking water supplies specify that there are “no designated limits” for sodium in drinking water. The regulation does state “Water containing more than 20 mg/L of sodium should not be used for drinking by people on severely restricted sodium diets. Water containing more than 270 mg/L should not be used for drinking by people on moderately restricted sodium diets.” Sodium is often found throughout the area, including areas upgradient and downgradient of the site, at concentrations above the 20 mg/L yet below the 270 mg/L advisory levels. The New York State Department of Health (NYSDOH) has notified residents whose homes have concentrations of sodium above 20 mg/L, that they should not drink this water if they are on severely restricted sodium diets. NYSDOH agrees with EPA that the sodium present in these wells is not related to the site.

OIG Recommendation #2

"We recommend that the Region 2 Regional Administrator modify and/or re-initiate some off-site monitoring if the Region determines it is needed to adequately support determinations of site protectiveness."

Region 2 Response

Region 2 concurs; Region 2 will continue to evaluate our monitoring program at the site, and if we determine that it needs to be modified to support determinations of site protectiveness, we will do so at that time.

If you have any questions on these comments, please contact John Svec of my staff at (212) 637-3699.

Appendix D

Distribution

Office of the Administrator
Assistant Administrator, Office of Solid Waste and Emergency Response
Acting Regional Administrator, Region 2
Principal Deputy Assistant Administrator, Office of Solid Waste and Emergency Response
Director, Office of Site Remediation and Innovation Technology, Office of Solid Waste
and Emergency Response
Agency Follow-up Official (the CFO)
Agency Follow-up Coordinator
General Counsel
Associate Administrator for Congressional and Intergovernmental Relations
Associate Administrator for Public Affairs
Audit Follow-up Coordinator, Office of Solid Waste and Emergency Response
Audit Follow-up Coordinator, Region 2
Acting Inspector General