



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NEW YORK, 10007

July 8, 2014

David E. Epps, P.G.
Project Director, Pompton Lakes Works
DuPont Corporate Remediation Group
2000 Cannonball Road
Pompton Lakes, New Jersey 07442

RE: DuPont Pompton Lakes Works Site
EPA/NJDEP Review & Approval
Ramapo River/Pompton River Substrate Characterization Technical Memorandum

Dear Mr. Epps:

The United States Environmental Protection Agency (EPA) and the New Jersey Department of Environmental Protection (NJDEP) have completed a review of the *Ramapo River/Pompton River Substrate Characterization Technical Memorandum* dated February 26, 2014. The technical memorandum provides proposed sediment sampling locations, their rationale for selection and analytical parameters based on the identification and mapping of depositional areas that accumulated fine-grained sediments within the Ramapo and Pompton Rivers. The implementation of the work proposed in the technical memorandum is intended to supplement previously obtained sediment (and other related) data in order to make an informed decision about the nature and extent of the remedy for the Acid Brook Delta (ABD) and associated lake/river system.

In conjunction with moving forward with the fieldwork, DuPont addressed the EPA/NJDEP comments provided as Attachment A herein in DuPont's July 3, 2014 Response to Comments correspondence. DuPont's Response to Comments are satisfactory. Based on EPA and NJDEP's review, the technical memorandum, including DuPont's Response to Comments is approved.

If you have any questions, please contact me at 212-637-4426 or katz.ira-perry@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Perry Katz", with a long horizontal flourish extending to the right.

Perry Katz, Remedial Project Manager
New Jersey Remediation Branch

Enclosure - Attachment A

cc: Anthony Cinque, NJDEP

ATTACHMENT A

RAMAPO RIVER / POMPTON RIVER SUBSTRATE CHARACTERIZATION – TECHNICAL MEMORANDUM EPA/NJDEP COMMENTS

OBJECTIVES AND SPATIAL SCOPE

Page 2, paragraph 2 – The area between Hamburg Turnpike and Pompton Lake Dam that was not subject to substrate mapping due to restricted access and safety concerns should be depicted on a Figure (a figure akin to Figure 9).

MAPPING SURVEY FINDINGS

Page 4, paragraph 3 – Clarify which survey location is referenced in the last sentence of the paragraph.

PREVIOUS CHARACTERIZATIONS

Page 5, Paragraph 1 -- Indicate who the prior physical characterization of sediments was performed on behalf of, if known.

GENERAL COMMENTS

1. There needs to be reference to the Health & Safety Plan to be utilized during the field operations.
2. There needs to be reference to the Quality Assurance/Quality Control Procedures to be utilized during the field operations.
3. The New Jersey certified lab needs to be identified that is performing the sediment sampling analyses.
4. What efforts will there be to identify other potential sources of mercury within the study area?
5. A proposed schedule to perform the work needs to be provided.
6. If at all possible, sediment samples should be collected immediately above dams in the waterway. These are high deposition areas and may hold relatively high mercury levels. DuPont has excluded these areas from sampling, citing safety concerns.
7. The sampling proposal calls for sediment cores to be collected and analyzed. These represent a vertical composite which may obscure relatively thin layers of higher mercury deposition (e.g., post-Irene or Hurricane Sandy sediment transport out of Pompton Lake and subsequent downstream deposition). DuPont should try to identify discrete depositional layers that may represent mercury reservoirs to the ecosystem.

