

## Haklar, James

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**From:** Peter Hansen <PHansen@ecolsciences.com>  
**Sent:** Friday, March 17, 2017 12:22 PM  
**To:** Haklar, James  
**Subject:** RE: Garwood Response to March 9, 2017 Meeting

Confirmed.

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**Peter A. Hansen, LSRP, LEP**  
**Vice President**

**EcolSciences, Inc.**  
75 Fleetwood Drive, Suite 250  
Rockaway, New Jersey 07866  
Ph. (973) 366 – 9500  
Cell (973) 945 – 3494  
Fx. (973) 366 – 9593  
phansen@ecolsciences.com

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**From:** Haklar, James [mailto:Haklar.James@epa.gov]  
**Sent:** Friday, March 17, 2017 12:22 PM  
**To:** Peter Hansen  
**Subject:** RE: Garwood Response to March 9, 2017 Meeting

Thank you, Peter. With regard to the wall sampling, please confirm that at least one sample will be collected from each wall in the areas to be sampled, and that the samples will be collected from within the first 5 feet from the floor. Aside from that, at this point I believe I can begin drafting the approval.

Sincerely,

Jim

James S. Haklar, Ph.D.  
Sr. PCB Disposal Specialist  
Division of Enforcement and Compliance Assistance

(732) 906-6817

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**From:** Peter Hansen [mailto:PHansen@ecolsciences.com]  
**Sent:** Thursday, March 16, 2017 4:25 PM  
**To:** Haklar, James <Haklar.James@epa.gov>  
**Cc:** Russo, Ed (EdRusso@russodevelopment.com) <EdRusso@russodevelopment.com>; Pembroke, Mike <MPembroke@russodevelopment.com>; Michael Schweitzer <MSchweitzer@ecolsciences.com>; David Loeffler

<DLoeffler@ecolsciences.com>

**Subject:** RE: Garwood Response to March 9, 2017 Meeting

Jim,

As a follow-up to our meeting on Thursday March 9, 2017 and telephone discussion on March 16, 2017, EcolSciences proposes the following revised sampling plan regarding masonry wall materials described in our January 27, 2017 response letter.

- Four discrete concrete/masonry samples will be collected from the walls within Area 1 (no change from the January 27, 2017 response letter).
- Ten discrete concrete/masonry samples will be collected from the walls within Area 2 (six additional samples beyond that proposed in the January 27, 2017 response letter).
- Ten discrete concrete/masonry samples will be collected from the walls within Area 3 (nine additional samples beyond that proposed in the January 27, 2017 response letter).
- No concrete/masonry samples will be collected from the walls within Area 4 (no change from the January 27, 2017 response letter).
- Twenty discrete concrete/masonry samples will be collected from the walls within Area 5 (ten additional samples beyond that proposed in the January 27, 2017 response letter).

All of the concrete/masonry wall samples will be collected in a manner consistent with that described in the original Application, Addendum, and Response letter. The sampling equipment will be decontaminated in accordance with the procedures described in the Application and TSCA. The revised sampling frequency provides an additional 24 samples from that proposed in our January 27, 2017 response letter. EcolSciences will collect complete one field blank for each sampling day. Duplicate samples for QA/QC purposes will be collected from the floor and wall concrete samples. Four locations will be selected from the floor sampling set and three locations will be selected from the wall sampling set for duplicate samples (five percent of the total number of samples).

If PCBs are identified in the additional concrete/masonry samples at concentrations above 10 mg/kg, EcolSciences will submit a plan to the USEPA for addressing the material prior to demolition. If PCBs are present in the concrete/masonry at concentrations below 10 mg/kg, it will be crushed and reused onsite without pre-approval from the USEPA. Please note that the Application and Addendum already provides a plan to address PCBs in the concrete at 77 mg/kg in the loading dock area (concrete will be crushed and reused within the low occupancy area).

You inquired about the protocols that will be followed for fluorescent light ballasts. Each fluorescent light ballast will be removed and inspected. All ballasts labeled as containing PCBs or not labeled relative to PCB content will be assumed to contain PCBs and will be disposed in accordance with the TSCA regulations.

Regarding the potential for dust to contain concentrations of PCBs due to aerial discharges of mists or fluid, EcolSciences proposes to collect five wipe samples of dust from horizontal rafter areas within the "Area 5" portion of the building where manufacturing operations likely involved PCBs. The wipe samples will be collected from 100 square centimeter areas and analyzed in accordance with the TSCA regulations. One field blank and duplicate sample will be collected for the "dust" wipe samples.

Relative to your request for evaluating the steel designated for recycling, after demolition the steel will be segregated and sampled prior to removal from the site for recycling. Once segregated, ten wipe samples will be collected from the steel. The quantity of steel is estimated at approximately 350 tons. Sample collection will be completed in such a manner to ensure that the 10 samples are evenly distributed throughout the steel for the building and the samples will be biased to suspected areas of contamination (i.e. staining, evidence of dirty steel, etc.). As such, the sample results will be representative of the steel throughout the building. I believe this sampling protocol is consistent with our initial discussions regarding this topic during the March 9, 2017 meeting. One field blank will be collected per day of sampling and one duplicate sample will be collected. The samples will be collected in accordance with the TSCA regulation.

If PCBs are not identified above 10 micrograms per 100 square centimeters (10ug/100 cm<sup>2</sup>) in the dust and steel samples, the steel will be immediately removed from the site for recycling. If exceedances of the 10ug/100 cm<sup>2</sup> threshold are identified, EcolSciences will submit a proposal to the USEPA to address the PCB impacts and removal will occur upon receipt of the USEPA's approval of the proposed remedy. The proposal will be consistent with the TSCA regulations.

Please confirm that these responses are acceptable and sufficient for you to proceed with drafting the Draft Risk Based Application Approval that we discussed on Thursday. Should you have any questions, please do not hesitate to call me at the office or on my cell phone.

Thanks,

-Peter

Peter A. Hansen, LSRP, LEP  
Vice President

EcolSciences, Inc.  
75 Fleetwood Drive, Suite 250  
Rockaway, New Jersey 07866  
ph. (973) 366-9500  
fx. (973) 366-9593  
cell (973) 945-3494

