

EXHIBIT 72



Transmitted Via Electronic Mail and Federal Express

October 30, 2009

U.S. Environmental Protection Agency, Region 2
2890 Woodbridge Avenue
Edison, New Jersey 08837
Attn: Thomas Budroe

Re: Verification/Validation and Data Usability Reports
Groundwater Field Investigation Plan – Phase I Removal Action Quality Assurance Project Plan
(QAPP 5), *CERCLA Non-Time-Critical Removal Action – Lower Passaic River Study Area,*
October 2009

Dear Mr. Budroe:

As part of the Groundwater Field Investigation Plan – Phase I Removal Action Quality Assurance Project Plan (QAPP 5), ARCADIS conducted a tidal study, groundwater withdrawal system (GWWS) shutdown/restart, and hydraulic conductivity testing. ARCADIS has completed the verification/validation process for the data collected during these tasks, as outlined in Worksheets 34 and 35 of QAPP 5, and assessed the data usability, as outlined in Worksheets 37 of QAPP 5.

Enclosed please find the field data verification/validation and data usability reports for the tidal study, GWWS shutdown/restart, and the hydraulic conductivity testing. These reports include a summary of major and minor findings and summary statistics and charts of water levels for the duration of each study.

Sincerely,

Tierra Solutions, Inc.

A handwritten signature in black ink, appearing to read "Paul J. Bluestein".

Paul J. Bluestein
Project Coordinator

On behalf of Occidental Chemical Corporation
(as successor to Diamond Shamrock Chemicals Company)

Enclosures

Verification-Validation Cover Letter.doc

10th Floor

Two Tower Center Blvd. East Brunswick, New Jersey 08816

- 1c: New Jersey Remediation Branch
Emergency and Remedial Response Division
U.S. Environmental Protection Agency, Region 2
290 Broadway, 19th Floor
New York, New York 10007-1866
Attn: Elizabeth Butler
- 1c: Office of Regional Counsel
U.S. Environmental Protection Agency, Region 2
290 Broadway, 17th Floor
New York, New York 10007-1866
Attn: Lower Passaic River Study Area Site Attorney – Patricia Hick
- 1c: New Jersey Department of Environmental Protection
Site Remediation Program
401 E. State Street
P.O. Box 028
Trenton, New Jersey 08265-0028
Attn: Janine MacGregor