EPA/ROD/R2006020001443 2006

# EPA Superfund Record of Decision:

ICELAND COIN LAUNDRY AREA GW PLUME EPA ID: NJ0001360882 OU 01 VINELAND, NJ 09/27/2006

# **DECLARATION STATEMENT**

# **RECORD OF DECISION**

# **SITE NAME AND LOCATION**

Iceland Coin Laundry Superfund Site (EPA ID #NJD0001360882) City of Vineland, New Jersey

## STATEMENT OF BASIS AND PURPOSE

This decision document presents the Selected Remedy to address contaminated groundwater at the Iceland Coin Laundry Superfund Site (Site) (also known as the Garrison Road Well Contamination Site) in the City of Vineland, New Jersey. The remedy was selected in accordance with the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) as amended, and, to the extent practicable, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). The decision is based on the Administrative Record file for the Site.

The State of New Jersey concurs with the selected remedy.

# ASSESSMENT OF THE SITE

The response action selected in this Record of Decision (ROD) is necessary to protect public health or welfare or the environment from actual or threatened releases of hazardous substances from the Site into the environment.

# **DESCRIPTION OF THE SELECTED REMEDY**

The Selected Remedy addresses contaminated groundwater emanating from the Site and moving approximately 4700 feet to the southwest. The primary groundwater contaminants are tetrachloroethene (PCE), and its breakdown products, trichloroethene (TCE) and cis-1,2 dichloroethylene (cis-1,2 DCE). In-situ biological treatment would be used to remediate the groundwater plume that contains. PCE at levels above 10 parts per billion (ppb). For the area outside the 10 ppb isoconcentration contour, natural attenuation would be monitored to ensure the remediation goal is achieved. After some pilot tests are conducted, nutrient amendments would be injected into the groundwater and then monitored. Additional injection events would occur, if required, followed by monitoring. Monitoring would continue until cleanup objectives are met. The major components of the Selected Remedy include:

• In-situ biological treatment for cleanup of the groundwater at the Iceland Coin Laundry Site. The in-situ treatment will be an enhanced anaerobic bioremediation (EAB) system.

- In addition, enhanced anaerobic biological treatment at the facility area, if necessary. If the design investigation indicates significant soil contamination adjacent to the source area, EAB will also be performed in this area.
- EAB performance monitoring Monitoring wells would be sampled to ensure that the conditions inside and along the edges of the contaminated area are conducive to biodegradation.
- Institutional controls Institutional controls for groundwater would include a Classification Exception Area (CEA) and well drilling restrictions to eliminate human exposure pathways to contaminated groundwater.
- Long-term groundwater monitoring The long-term monitoring program would track contaminant concentration changes and migration outside the treatment area. The monitoring will be conducted to establish whether contaminants are meeting the appropriate New Jersey Ground Water Quality Standards (NJGWQSs) or Maximum Contaminant Levels (MCLs), whichever are lower.
- If during implementation, residences or businesses within the aerial extent of the Site plume are found to have not yet been connected to public water, EPA would consider connecting them to the public water. supply.

# **DECLARATION OF STATUTORY DETERMINATIONS**

## Part 1: Statutory Requirements

The Selected Remedy is protective of human health and the environment, complies with Federal and State requirements that are applicable or relevant and appropriate to the remedial action, is cost-effective, and utilizes permanent solutions and alternative treatment (or resource recovery) technologies to the maximum extent practicable.

## **Part 2: Statutory Preference for Treatment**

The Selected Remedy for groundwater will meet the statutory preference for the use of remedies that employ treatment that reduces the toxicity, mobility or volume as a principal element.

## Part 3: Five-Year Review Requirements

Because this remedy will not result in hazardous substances, pollutants or contaminants remaining on-site above levels that allow for unlimited use and unrestricted exposure after implementation of the remedy, a statutory five-year review is not required. Although five-year reviews are not required by statute in connection with this alternative, it is EPA's policy to conduct five-year reviews until cleanup goals have been achieved to ensure that the remedy is, or will be, protective of human health and the environment.

# **ROD DATA CERTIFICATION CHECKLIST**

The following information is included in the Decision Summary section of this Record of Decision. Additional information can be found in the Administrative Record file for the Site.

- Chemicals of concern and their respective concentrations may be found in the "Site Characteristics" section.
- Baseline risk represented by the chemicals of concern may be found in the "Summary of Site Risks" section.
- A discussion of cleanup levels for chemicals of concern may be found in the "Remedial Action Objectives" section.
- A discussion of source materials constituting principal threats may be found in the "Principal Threat Waste" section.
- Current and reasonably anticipated future land use assumptions are discussed in the "Current and Potential Future Site and Resource Uses" section.
- A discussion of potential land uses that will be available at the Site as a result of the Selected Remedy is found in the "Current and Potential Future Site and Resource Uses" section.
- Estimated capital, annual operation and maintenance (O&M), and total present worth costs are discussed in the "Description of Alternatives" section.
- Key factor(s) that led to selecting the remedy (i.e., how the Selected Remedy provides the best balance of tradeoffs with respect to the balancing and modifying criteria, highlighting criteria key to the decision) may be found in the "Comparative Analysis of Alternatives" and "Statutory Determinations" sections.

Sector Para and a sector

Date

George Pavlou, Director Emergency and Remedial Response Division U.S. Environmental Protection Agency, Region II

# **RECORD OF DECISION**

Iceland Coin Laundry Superfund Site 1888 South Delsea Drive Vineland, Cumberland County, New Jersey

United States Environmental Protection Agency Region II September 2006

# **TABLE OF CONTENTS**

PAGE

SITE NAME. LOCATION AND BRIEF DESCRIPTION		1
SITE HISTORY		1
ENFORCEMENT ACTIVITIES		4
HIGHLIGHTS OF COMMUNITY PARTICIPATION		4
SCOPE AND ROLE OF RESPONSE ACTION		5
SUMMARY OF SITE CHARACTERISTICS		5
CURRENT AND POTENTIAL FUTURE SITE AND RESOURCE USES		12
SUMMARY OF SITE RISKS		13
REMEDIAL ACTION OBJECTIVES		17
DESCRIPTION OF ALTERNATIVES		19
COMPARATIVE ANALYSIS OF ALTERNATIVES		26
PRINCIPAL THREAT WASTE		29
SELECTED REMEDY		29
STATUTORY DETERMINATIONS		30
DOCUMENTATION OF SIGNIFICANT CHANGES		32
<u>APPENDICES</u>		
APPENDIX I	FIGURES	
APPENDIX II	TABLES	
APPENDIX III	ADMINISTRATIVE RECORD INDEX	
APPENDIX IV	NJDEP CONCURRENCE LETTER	

APPENDIX V RESPONSIVENESS SUMMARY

# **SITE NAME, LOCATION AND BRIEF DESCRIPTION**

The Iceland Coin Laundry Superfund site (Site) is located at the former Iceland Coin Laundry and Dry Cleaning facility, at 1888 South Delsea Drive (Block 911, Lot 2) in the City of Vineland, Cumberland County, New Jersey. The study area which covers about 15 acres, consists of the former facility and the associated groundwater plume to the south/southwest. The contaminated groundwater plume area. encompasses South Delsea Drive, Dirk Drive, Garrison Road, Lois Lane, South Orchard Road, West Elmer Road and West Korff Drive (Figure 1).

The former Iceland Coin Laundry and Dry Cleaning facility consists of a 13,000 square foot, one-story building and adjacent parking areas on approximately 1.4 acres (Figure 2). A concrete pad is located in the northwest corner of the property, behind the building. The property is currently owned by Nicholas and Katherine Mainiero, who began operating a retail appliance and jewelry store in October, 1997. To the west of the Site is a mobile home park, to the south are houses and some small commercial buildings. There is a used car sale lot to the north and a vacant property once used as an automobile repair shop across Delsea Drive to the east. Adjacent to the vacant property on the east side of Delsea Drive is a New Jersey Department of Transportation (NJDOT) facility.

The Site was placed on the U.S. Environmental Protection Agency's (EPA's) National Priorities List in October 1999. EPA is the lead agency, and the New Jersey Department of Environmental Protection (NJDEP) is the support agency.

# **SITE HISTORY**

The former Iceland Coin Laundry and Dry Cleaning facility has been utilized for numerous purposes beginning with the Vineland Fruit and Poultry Farms Association prior to 1930 through 1953. From 1953 to 1971, Iceland Coin Laundry operated at the site. According to Anthony Chinnici, former owner of the property, an ice skating rink was present in the building from 1955 until 1965. The building was then leased, in succession, to an unknown party for teenage dances, to Royal Crown Beverages for storage, and to Owens-Illinois for storage. Mr. Chinnici sold the building in 1972.

Since 1972 the building was occupied by Anastasi Carpets (carpet sales), South Jersey Paper Company (Party favor sales), Buena Plumbing (pipe storage), and Kelly Carpet (carpet sales). No manufacturing operations were conducted on the property. On July 11, 1997 Donald Barton sold the property to the Mainieros, who began operating a retail appliance and jewelry store in October 1997.

The former Iceland Coin Laundry and Dry Cleaning facility operated from approximately 1953 until at least 1971. Limited information is available regarding waste disposal areas and systems. The City of Vineland Department of Health plumbing records from 1962 and 1963 illustrate septic system designs for the Iceland Skating Rink and Iceland Laundry facilities.

Four coin-operated dry cleaning units of eight-pound capacity were present in the Laundromat, each using four gallons of tetrachloroethene (PCE). It is not known how often the PCE was refilled. No waste/sludge was reportedly generated, since the PCE evaporated. The lint filters from the dry cleaning units were allegedly burned outside in the back of the building.

Two 14-foot deep seepage pits/cesspools with a 40-foot drain field between the pits were used beginning in 1962. According to the former owner, the cesspools were located in the front of the building. Septic system design drawings from 1963 indicate effluent from 10 washers discharged to a septic tank, continued through a 100-foot field drain, and terminated at a 4-foot diameter receptor vessel. The property was connected to the sanitary sewer in 1986.

Anastasi Carpets renovated the building when they began operations in 1972. Additionally, according to the owners of Euena Plumbing, the only septic system utilized on the property prior to their connection to the sanitary sewer in 1986 was a septic tank (not the same tank described above) for the disposal of sanitary waste. The septic tank was located partially under the south side of the building in the same area where the current sewer line exits the building.

On September 3, 1987, the City of Vineland Health Department collected a potable well sample from 1276 Garrison Road, in which trichloroethene (TCE) was detected at a level of 8 parts per billion (ppb). A second sample was collected in August 1990, in which both TCE and PCE were detected at levels of 14 ppb and 37 ppb, respectively. A third sample in October 1990 confirmed the presence of TCE (6.8 ppb) and PCE (25 ppb). The levels in this well exceeded both the State and Federal maximum contaminant levels (MCLs). Based on the analytical results, the homeowner was advised to discontinue using the well water for cooking and drinking purposes.

From December 1990 to September 1991, the City of Vineland Health Department collected potable well samples from 55 residences located in the area of Garrison Road and West Korff Drive. Analytical results from these sampling activities revealed levels of VOCs (volatile organic compounds) and mercury above Federal and State MCLs in 21 of the 55 water well samples. The primary contaminants were PCE, TCE, 1,2-dichloroethene (1,2-DCE), and mercury. The well with the detected concentration of mercury was subsequently resampled and mercury was not detected.

In November 1991, as a result of the private well contamination, NJDEP installed point-of-entry treatment (POET) units at the affected residences as a temporary remedial measure. In July 1994, the Vineland City Water Department extended public water hook-ups to the affected residences. In December 2003, four residential wells were still in use; three were used for irrigation only and one was still used for drinking water. The owner refused to be connected to public water and had a Point of Entry Treatment system installed.

In November 1991 the NJDEP Bureau of Environmental Measurements and Quality Assurance (BEMQA) conducted a. soil gas survey 6 to 9 feet beneath the surface at the Site. PCE was detected at a maximum level of 40,675 ppb in the northwest corner of the property and 2,419 ppb in the west central part of the property. TCE was also detected at a level of 116.6 ppb in the

northwest corner soils. PCE (1,233 ppb) and TCE (548 ppb) were also found on south Delsea Drive in front of the used car lot. BEMQA concluded that a potential source of contamination was located in the northwest corner of the property and possibly in front of the used car lot on South Delsea Drive.

In the NJDEP's November 1991 Investigation, soil gas samples and groundwater samples were collected from Greg's Automotive World property at 1903 South Delsea Drive (Block 914, Lot 15) which is across Delsea Drive to the east of the Iceland Coin Laundry facility. Results of the soil gas survey did not suggest this Site was the source of the volatile organics impacting the down-gradient wells. Groundwater. samples collected in 1995 and 1996 from the monitoring well on the property and additional Geo-Probe direct push samples did not exhibit any detectable concentrations of PCE, TCE or 1,2 DCE.

Soil gas and groundwater samples were also collected from Fred Bianco's Auto Collision shop at 1791 South Delsea Drive (Block 914, Lot 20) which is across South Delsea Drive and to the northeast of the Site. A septic system was used from 1961 until city sewer lines were installed in 1975. Fred Bianco's Right To Know survey listed a number of chemicals used in the auto body repair and painting operations which included PCE and 1,1,1-trichloroethane. On November 1, 1995 NJDEP collected two soil samples from the area below the exhaust fans. The samples exhibited detectable levels of toluene and xylenes. In November 1995 NJDEP collected four groundwater samples from Geo-Probe borings and one monitoring well. No PCE, TCE or 1,2 dichloroethylene was detected in the groundwater or soil samples, but they did find toluene at 1 to 2 ppb, which is below the NJDEP Groundwater Quality Standard of 1,000 ppb.

Shaud's Auto Sales (aka Valentine Auto, Kemp's Auto Sales) at 1874 South Delsea Drive (Block 911, Lot 1) is directly north of the Iceland Coin Laundry facility. In November 1991, NJDEP collected soil gas samples from this property. PCE was found at a level of 548.3 ppb in front of the facility on Delsea Drive. The highest concentration of PCE (40,675 ppb) was found near the southwest corner of the property along the fence line between them and the Iceland Coin Laundry property. NJDEP, BEMQA did not observe any signs of a potential source for the contamination on the used car lot property. Documentation reveals that the lint filters from the Iceland Coin Laundry facility were burned in the northwest corner of the Iceland property.

On August 31, 1993, NJDEP Bureau of Field Operations, Site Assessment section collected soil samples from eight locations identified in the soil gas survey on the White Swan Site. The results showed no volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs) or pesticides above the NJ Soil Cleanup Criteria.

A January 25, 1994 New Jersey Department of Law and Public Safety, Division of Law memorandum indicates that a diesel and/or gasoline pump may have been located near the southwest corner of the building. However no records were found to confirm the presence of a pump and no evidence of an underground storage tank (UST) was observed during the New Jersey Department of Environmental Protection (NJDEP) investigations.

In 1995 and 1996 NJDEP conducted an expanded site investigation at the Site which included soil and groundwater sampling. The soil sample results were below the NJ Soil Cleanup Criteria. The groundwater results from the first sampling in 1995 showed PCE at a maximum level of 140 ppb south of the Iceland Coin Laundry building with only 19 ppb in the northwest corner. No PCE or TCE was detected in groundwater samples from east and north (upgradient) of the Iceland facility property. A second groundwater sampling event occurred in May 1996 which showed PCE at a level of 91 ppb south of the building. The third groundwater sampling event in November 1996 showed PCE at only 17.5 ppb and TCE at 1.7 ppb in the northwest corner of the Iceland property but PCE was found at 489 ppb and TCE at 294 ppb in an adjacent residential property to the southwest. The PCE and TCE plumes were moving to the southwest.

The Site was placed on the U.S. Environmental Protection Agency's (EPA's) National Priorities List in October 1999. CDM Federal Programs was given the work assignment to conduct a Remedial Investigation and Feasibility Study and they started their field activities in June 2002.

## **ENFORCEMENT**

In response to an NJDEP information request letter in March 2000, Anthony and Dorothy Chinnici admitted to using PCE in their dry cleaning process from approximately 1963 through 1972 but did not maintain records of usage or disposal.

In a letter dated December 27, 2001 EPA notified Anthony and Dorothy Chinnici of their liability for costs incurred by EPA with respect to the Site. In January 2002, the Chinnici's attorney, James Gruccio, informed EPA that the Chinnici's had no ability to pay the claims. EPA then requested additional documentation in the form of tax returns through the year 2002 and any other asset information. In addition, EPA asked for documentation regarding the Chinnici's insurance company, Traveler's Insurance. Finally, EPA asked to be included in any settlement negotiations with the state of New Jersey. EPA is still evaluating the Chinnici's ability to pay.

In September 2005, EPA sent an Information Request Letter to Nicholas and Catherine Mainiero of 1888 South Delsea Drive, the current owners of the Iceland Coin Laundry building. In response Mr. Mainiero indicated he operated a retail appliance store and did not store or use any hazardous chemicals.

## **HIGHLIGHTS OF COMMUNITY PARTICIPATION**

On August 5, 2006 EPA released the. Proposed Plan and supporting documentation for the groundwater remedy to the public for comment. EPA made documents available to the public in the Administrative Repositories maintained at the EPA Records Center, 18th floor, 290 Broadway, New York, N. Y. and the City of Vineland Health Department, 640 East Wood Street, City of Vineland, New Jersey. EPA published a notice of availability for the documents in the Vineland's *The Daily Journal* and opened a public comment period from August 5, 2006 to September 5, 2006. On August 10th EPA and a representative from NJDEP conducted a public meeting in the Council Chambers room of the Vineland City Hall to inform local officials and

interested citizens about the Superfund process, to review the planned remedial activities at the Site, and to respond to any questions from residents and other attendees. There were no comments received at the public meeting or received in writing during the public comment period. If there were, they would have been included in the Responsiveness Summary (See Appendix V) which is part of the Record of Decision.

## **SCOPE AND ROLE OF RESPONSE ACTION**

For the purposes of planning response actions, EPA will address the Site in a single remedial phase or operable unit (OU). This ROD address contaminated groundwater within the City of Vineland associated with the Site. This action is considered the final remedy for the groundwater and the soils at the Site.

#### SUMMARY OF SITE CHARACTERISTICS

#### **Conceptual Site Model**

The Conceptual Site Model (CSM) for the Iceland Coin Laundry Superfund Site organizes existing information on physical (soils, stratigraphy, hydrology, hydrogeology, and climate) and contaminant (vertical and lateral plume extent) properties to preliminarily characterize contaminant migration in environmental media at the Site.

Iceland Coin Laundry operated as a conventional dry cleaning establishment during the 1960s and 1970s and utilized PCE as a product in the cleaning process. Spent product may have been dumped on the ground surface or routed to a septic tank and septic leach field. Saturated lint filters were burned on the sandy, porous ground surface. Soil gas samples and groundwater containing elevated concentrations of PCE have been encountered at the Site.

Iceland Coin Laundry is underlain by relatively permeable Cohansey Sand Formation in hydraulic connection with the Kirkwood/Cohansey Aquifer System. A moderately thin unsaturated zone underlies the Site with the water table occurring at depths ranging from 15 to 20 feet below grade. This permeable substrate facilitates rapid infiltration of precipitation and liquids, including chemicals, discharged onto the ground surface.

Contamination emanating from the Iceland Coin Site consists of PCE and its breakdown products TCE, and cis-1, 2-DCE. PCE has migrated into the subsurface, through the vadose zone and to the water table. In the vadose zone, contaminant migration is controlled by sorption to framework minerals or organic materials, volatilization as. a gas in pore spaces, or dissolution in pore water.

In groundwater, VOCs also migrate as free product or dense, nonaqueous phase liquids (DNAPL). DNAPL typically migrates vertically downward or at an angle until encountering an impermeable boundary such as a. clay lens. Upon encountering a boundary, DNAPL spreads

laterally and migrates with flowing groundwater. The presence of DNAPL is expected with VOC compounds like PCE if concentrations approach one percent of the compound's solubility limits. The concentrations of VOCs in groundwater sampled at the Site do not approach one percent of PCE's solubility limit.

The PCE/TCE plume has traveled to the southwest and downward such that the high concentration "core" of the plume has moved approximately 2,000 feet from the source area and is about 70 feet beneath the ground surface. There is clean water above the plume all the way up to the top of the unconfined aquifer. (See Figure 5).

Volatilization of VOCs located in subsurface soils or in groundwater, and the subsequent transport of these vapors into indoor spaces where they are subject to inhalation, constitutes a potential exposure pathway at the Site. VOCs in soil gas could migrate by vapor diffusion up and into the buildings in the vicinity of the source area where the contamination was introduced into the sub-surface.

#### Site Description

The Site is located at the former Iceland Coin Laundry and Dry Cleaning facility, at 1888 South Delsea Drive, in the City of Vineland, Cumberland County, New Jersey. The study area, which covers approximately 15 acres, consists of the former Iceland Coin Laundry and Dry Cleaning facility and the associated contaminated groundwater plume to the south/southwest of the former facility. The Iceland Coin Laundry and Dry Cleaning facility consists of a 13,000 square-foot, cinder-block commercial building and adjacent parking areas on approximately 1.4 acres. A concrete pad is located in the northwest corner of the property, behind the building. The Site building is a standard cinder block construction commercial building, rectangular in shape and one story high. The main entrance is on east side, facing Delsea Drive. There are large garage doors for truck loading in the back (west side) of the building. There is an asphalt covered parking lot on the east, south and south west parts of the property. The parking lot is fenced along the south, west and north property lines. To the west of the Site is a mobile home park, to the south is a home, adjacent to the north is a used auto lot, and to the east is vacant property once used as an automotive repair shop, and a New Jersey Department of Transportation (NJDOT) facility. The former Iceland Coin Laundry and Dry Cleaning facility is currently owned by Nicholas and Katherine Mainiero, who began operating a retail appliance and jewelry store in early October 1997.

#### Site Topography and Surface Water

The Site is relatively flat; the elevation is just under 70 feet above mean sea level (amsl) at the former Iceland Coin Laundry and Dry Cleaning facility and rises to just above 100 feet amsl 4,000 feet to the south. It is located in a mixed residential, light industrial-commercial part of the City of Vineland. There is an intermittent stream, the Parvin Branch, that flows from east to west just to the north of the Site. There are no surface water pathways from the Site to the Parvin Branch. The Parvin Branch flows west about one and a half miles into the Maurice River, which

then flows south into Union Lake and then south into the Delaware Bay. Union Lake is an 800 acre man-made impoundment that is approximately two miles long and one mile wide. There are very wide floodplains associated with the Maurice River, about one and one half miles from the Site. The Maurice River and its floodplains are designated as the Union Lake Wildlife Management Area/Sherman Avenue National Heritage Priority Site, approximately 7,000 feet southeast of the Site.

#### Site Soils

The soil in the eastern portion of the Site is composed of Hammonton loamy sand, 0 to 5 percent slopes, which has a 10-inch thick surface layer of loamy sand. The upper part of the subsoil is mottled yellowish-brown, sandy loam that extends to a depth of 16 inches below which is yellowish-brown, sandy loam to 24 inches. The upper part of the substratum is mottled yellow, loamy sand to a depth of 42 inches with yellowish-brown, gravelly sand to a depth of 60 inches.

The soil in the western portion of the Site is composed of Sassafras sandy loam, 2 to 5 percent slopes, which has a 10-inch thick plow layer of dark yellowish-brown, sandy loam. This is underlain by yellowish-brown, sandy clay loam to a depth of 30 inches. The lower part of the subsoil is yellowish-brown, sandy loam to a depth of 40 inches. The substratum is brownish-yellow, loamy sand to a depth of 60 inches.

#### Site Geology

As described by the New Jersey Geological Survey, the formation exposed at the surface on and around the Site is the Cohansey Sand Formation. The upper unit consists of a complex succession of inter-bedded and inter-fingered unconsolidated lithologic units deposited in a variety of coastal/marginal marine deposition environments which shifted seawards and landwards through time. The Cohansey Sand consists of medium- to coarse-grained, light-colored, pebbly sand and gravel, with lenses of silt and clay of varying lateral extent. Although the intermittent clay lenses may act as local confining units, it is not likely that they have a significant impact on the migration pathway for the contaminant plume in the shallow, intermediate and deep zones.

The Kirkwood/Cohansey Aquifer system is a major aquifer system in the eastern and coastal areas of the New Jersey Coastal Plain province. The aquifer system consists of the Miocene-age Kirkwood Formation and the overlying Pliocene-age Cohansey Formation. Sand units from both formations form a system of layered aquifers separated by clay beds of varying lateral continuity. Numerous domestic, agricultural, and municipal wells are installed in the Kirkwood/Cohansey Aquifer, which in places can support production capacities up to 1,500 gallons per minute from a single well. In most areas, the Kirkwood/Cohansey Aquifer System is unconfined, and thus recharged directly from the ground surface. Hydraulic gradients are generally downward across the Site with the largest gradient between the shallow and intermediate monitoring wells. The gradients between the intermediate and deep wells across the Site are very small and in some cases, almost zero. Mean annual precipitation in the south Jersey area is about 40 inches per year.

No federal or state listed threatened and endangered species were observed during the Site visit conducted, in July 2002.

No wetlands were identified in the vicinity of the Site.

## Sampling Strategy

From June 2002 through December 2003, CDM conducted RI field investigations at the Site, including a source area investigation, a geologic and hydrogeologic investigation, and an ecological investigation. A topographic and a cultural resources survey were also conducted. The source area and geological/hydrogeological investigations were each designed as a phased approach, using both screening-level and definitive-level data, to efficiently characterize the nature and extent of potential on-Site source areas and the contaminant plume migrating from the Site. Each phase of the investigations was designed to refine locations for subsequent phases of the investigation.

## **Source Area Investigation**

## Soils Characterization

On September 5, 2002 and June 2, 2003, topographic surveys were performed after the completion of field activities using a Global Positioning System (GPS) to produce a Site base map and a study area location map. A topographic base map was created for the Site and illustrates both the Site and the study area for a minimum of two miles to the southwest and a minimum of one mile to the northeast. A geophysical survey was conducted using the electromagnetic induction terrain conductivity (commonly called EM-31) and ground penetrating radar (GPR). The subcontractor detected two low amplitude apparent conductivity anomalies, indicating the presence of conductive soil south of the on-Site building. Two trenches were excavated in these areas down to a level of six feet beneath the ground surface in the anomaly areas. No contaminant sources were identified.

A Membrane Interface Probe (MIP)/Electrical Conductivity (EC) Soil Characterization study was conducted. The MIP obtains qualitative (i.e., screening-level data), depth-continuous, total VOC concentrations in the unsaturated zone by collecting depth-continuous flame ionization detector (FID), photoionization detector (PID), and electron capture detector (BCD) data in real time as the probe is advanced into the subsurface. The BCD is particularly sensitive to the chlorinated solvents. The EC data, collected simultaneously, were used to determine the electrical conductivity profile of the lithology. A total of 16 shallow MIP/EC pushes were advanced through the overburden material, around the former Iceland Coin Laundry and Dry Cleaning facility, to a depth of approximately 15 feet below ground surface (bgs). The results of the MIP/EC soil characterization were used to determine contaminated areas in which to focus the subsurface soil sampling program.

#### **Surface Soil Sampling**

Surface soil samples were also collected from 10 on-Site locations (Figure 2) to assess potential contamination from surface disposal of wastes associated with the former dry cleaning operations. All surface soil samples were collected from 0 to 6 inches except for three samples collected at the Site's asphalt parking area. Due to the asphalt covering, soil from these locations was sampled from 3 to 9 inches bgs. The surface soil sample results, which are considered definitive-level data, were used to characterize potential surficial source areas.

#### **Subsurface Soil Sampling**

Subsurface soil samples were collected from three soil borings on former Iceland Coin Laundry and Dry Cleaning property based upon VOC detection responses from the MIP survey.. The total depth of the subsurface soil samples collected were from 1 to 11 feet bgs. The subsurface soil sample results, which are considered definitive-level data, were used to characterize potential subsurface source areas.

#### **Soil Contamination**

MIP/EC readings indicated elevated levels of VOCs in two areas: in the northeast corner of the Site, in front of the building (former cesspool and leakage pit area), and in the northwest corner, behind the building (former burn pit area). PCE was detected in five surface and one subsurface soil sample locations at levels below screening criteria in these same areas. 4-Methyl-2-pentanone was also detected in one surface soil location (SS-03) below screening criteria but above background levels.

It should also be noted that Semi-Volatile Organic Compounds (SVOCs), mainly Polynuclear Aromatic Hydrocarbons (PAHs), were detected in three on-Site surface soil samples located in the eastern area of the Site (SS-01, SS-02, and SS-10) (Figure 2). PAHs exceeded screening criteria in two of these locations. Although PAHs are not considered contaminants of potential concern (COPCs) for the Site, it is possible that these areas may indicate areas of unidentified past disposal. Three pesticides and 22 metals were also detected, but at levels below screening criteria. These contaminants are not considered to be Site-related.

## **Groundwater Characterization**

## **MIP/EC Groundwater Characterization**

The geologic and hydrogeologic investigation utilized the MIP and EC to obtain qualitative (i.e., screening-level data), depth-continuous readings of total VOCs in the saturated zone. Ten locations, located upgradient, on, and downgradient of the former facility, were advanced to a depth of 120 feet bgs. The MIP/EC survey provided instantaneous, depth continuous graphical readouts of electrical conductivity (EC), flame ionization, photoionization, and electron capture (BCD). The results of the MIP/EC groundwater characterization were used to determine

contaminated areas in which to focus the locations and depths of discrete-depth direct push technology (DPT) groundwater samples.

## Discrete-Depth, Direct Push Technology (DPT) Groundwater Sampling

A total of 62 groundwater samples were collected from 16 locations upgradient, on, and downgradient of the former facility. The results of the discrete-depth groundwater samples, which are also considered screening-level data, were used to determine locations and screen intervals for permanent monitoring wells.

#### **Monitoring Well and Piezometer Installation**

Twelve monitoring well clusters, with a total of 27 shallow, intermediate, and deep monitoring wells, were installed in areas upgradient, on, and downgradient of the former facility, to obtain analytical, water quality, water table elevation, and groundwater flow data. Lithologic data obtained during well installation was used to determine the geometry and lithology of the aquifer, and to determine the location and extent of potential confining units. For each cluster, well screen intervals were generally based on the discrete-depth DPT results, with shallow well screens just above the contaminant plume, intermediate well screens set within the plume, deep well screens set below the plume (Figure 5).

#### Monitoring Well and Residential Well Sampling

Two rounds of groundwater samples were collected and analyzed from the 27 monitoring wells using low-flow sampling techniques, and from two residential wells using tap water sampling techniques, in order to define the current nature and the vertical and horizontal extent of the contaminant plume.

#### **Groundwater Contamination**

Site-related contaminant concentrations that exceed the screening criteria are PCE, TCE, and cis-1, 2-DCE. During the DPT screening program, PCE was detected at concentrations that exceeded its regulatory standard in 15 of 62 samples collected from 9 locations. The highest PCE concentration of 230 parts per billion (ppb) was detected in sample GS-05-047 (depth is 47 feet bgs) at 12.9 feet above mean sea level (amsl), collected about 1,300 feet hydraulically downgradient (southwest) of the former facility. The concentration of PCE in this sample exceeds the New Jersey Ground Water Quality Standard (NJGWQS) of 1 ppb. The subsurface distribution of PCE indicates that the core of the plume has migrated hydraulically downgradient from the source area over time and that residual contamination remains at a lower concentration in and around the source area (See Figure 3).

The groundwater screening sample collected farthest hydraulically downgradient that exceeds screening criteria is GS-09-091 (-12.7 feet amsl), collected along South Orchard Road. The 6 ppb concentration of PCE in this sample exceeds the NJGWQS of 1 ppb. Although regulatory

standards were not exceeded in the most downgradient location, GS-13, PCE was detected at 0.46 ppb in the deepest sample, collected at about 100 feet bgs.

PCE also extends to a greater depth than was sampled during the DPT screening program. Sample location GS-06 had a PCE concentration of 6.7 ppb at the maximum sample depth of 90 feet bgs, and sample location GS-07 had a PCE concentration of 0.68 ppb at the maximum sample depth of 120 feet bgs. Both of these locations are along the axis within the region of the groundwater contaminant plume that has migrated to the deepest extent in the aquifer.

During the DPT screening program, TCE was detected at concentrations that exceeded its regulatory standard in 4 of 62 samples collected from 4 locations. The TCE plume is similar in shape but smaller than the PCE plume. The highest PCE (230 ppb) and TCE concentrations (74 ppb) were detected in sample GS-05-047 at an elevation of 12.9 feet amsl. This sample was collected at the water table near the southeast corner of the former Iceland Coin Laundry and Dry Cleaning facility.

The chemical cis-1,2-DCE was detected at 76 ppb, a concentration that exceeded its regulatory standard of 70 ppb, in only 1 of 62 samples. The exceedance was detected in sample GS-02-018 collected at 49.5 feet amsl, at the water table near the southeast corner in front of the former Iceland Coin Laundry and Dry Cleaning facility. As with the TCE groundwater contaminant plume, the cis-1, 2-DCE plume is a geometric subset of the PCE plume.

The discrete-depth groundwater sample data indicates the contaminant plume dives deeper as it progresses hydraulically downgradient, indicating the presence of both a lateral and a downward-directed groundwater gradient in the vicinity of the Site and downgradient areas.

During the monitoring well sampling program, round 1 and round 2, TCE and PCE were detected in monitoring wells at levels above screening criteria during both sampling rounds. All TCE and PCE exceedances occurred in 5 of the 12 monitoring well clusters. These clusters (MW-2, MW-3, MW-4, MW-7, and MW-11) are generally situated along the axis of the plume, with well cluster identification numbers increasing to the southwest, away from the source area (MW-2 is within the source area whereas MW-11 is the furthest downgradient well cluster). Within these well clusters, exceedances were detected in shallow wells closer to the source area and in intermediate wells further downgradient. No exceedances were detected in wells completed in the deep zone of the aquifer (Figure 4).

Concentrations in individual clusters tended to change from the first sampling round in June 2003 to the second sampling round in December 2003. Concentrations in shallow wells in the northeast half of the plume tended to decrease whereas concentrations in , intermediate wells in the southwest (downgradient) half of the plume tended to increase slightly or remain the same. June 2003 samples detected PCE in shallow monitoring wells MW-02S (5 ppb), MW-03S (5.3 ppb), and MW-07S (21 ppb). TCE was detected in MW-07S at 1.6 ppb. Round 2 sampling results in December 2003 indicate that PCE concentrations decreased in MW-02S and MW-07S and concentrations in MW-03S were similar. TCE concentrations in MW-07S decreased from

1.6 ppb to below detection limits. In contrast, concentrations generally increased slightly in intermediate wells MW-03I, MW-04I, MW-07I, and MW-11I from June to December 2003. Of particular note are concentrations within MW-11I, which is in the most downgradient well cluster. TCE levels in MW-11I rose slightly from 1.7 ppb to 2.6 ppb and PCE levels rose from 10 ppb to 14 ppb.

One Site-related VOC was present in the residential well on South Orchard Road, situated near the northern boundary of the plume, north of the MW-06 cluster. PCE was detected at 4.9 ppb during Round 1; levels dropped to 3.4 ppb during Round 2. These levels are below the Federal MCL of 5 ppb but above the NJDEP MCL of 1 ppb. This resident stopped using this well for drinking and only uses the water for irrigation. No VOCs were detected above screening criteria in the residential well on Garrison Road, located east of the MW-08 cluster, south of the plume.

#### **Source of Contamination**

The only known source of contamination was the Iceland Coin Laundry facility.

#### **Contaminant Fate and Transport**

The potential for environmental transport was examined by reviewing the topographic and hydrogeologic characteristics of the Site and by reviewing the available physical constants and chemical characteristics of each constituent. The most significant fate and transport processes for the Site are summarized below.

- Chlorinated VOCs were introduced to the groundwater from discharge to ground surface at the facility in the areas of MW-02. VOCs have low adsorption to the materials in the groundwater and are mobile and biodegradable. As they move with the groundwater away from the source areas, the concentrations are expected to decrease mainly from dispersion and dilution effects.
- The presence of PCE biodegradation products such as TCE and cis-1, 2-DCE along with the chemical characteristics of the groundwater at the Site indicate that natural attenuation may be occurring. Another suggestion of natural attenuation occurring at the source after contaminant disposal is the presence and. concentrations of chloride and cis-1, 2-DCE.
- The contaminant data indicate that the plume is migrating vertically downward and horizontally to the southwest and south. In all instances, levels of PCE were greater than TCE levels.

## **CURRENT AND POTENTIAL FUTURE LAND AND RESOURCE USES**

The former Iceland Coin Laundry and Dry Cleaning facility is located in a commercial/ residential area of the City of Vineland, Cumberland County, New Jersey. Since 1997, the facility has been solely utilized as a retail appliance and jewelry store. To the west of the Site is a mobile home park, to the south is a residential lot, adjacent to the north is a used auto lot, and to the east is vacant property once used as an automotive repair shop, and a NJDOT facility. Future use of the facility will likely remain commercial/residential, based on historical land use, surrounding property use, current zoning, and future plans for redevelopment.

Groundwater within the Site area is classified by NJDEP as a Class IIA resource, a current source of drinking water, and it is expected to remain a source of drinking water in the future. A residential community is located southwest of the Site. In the past, most of the houses had their own drinking water wells. Within this community, PCE contamination in groundwater was documented in 16 residential wells, which served approximately 44 people. During 1994, the City of Vineland Water Department extended public water throughout the affected area. By early 1996, 91 homes were connected to public water.

## SUMMARY OF SITE RISKS

Based upon the results of the RI, a baseline risk assessment was conducted to estimate the risks associated with current and future Site conditions. The baseline risk assessment estimates the human health and environmental risk that could result from the contamination at the Site if no remedial action were taken.

## Human Health Risk Assessment

A four-step process is used for assessing Site-related human health risks for a reasonable maximum exposure (RME) scenario: *Hazard Identification* - identifies the contaminants of concern at the Site based on several factors such as toxicity, frequency of occurrence, and concentration. *Exposure Assessment* - estimates the magnitude of actual and/or potential human exposures, the frequency and duration of these exposures, and the pathways (e.g., ingesting contaminated well-water) by which humans are potentially exposed. *Toxicity Assessment* - determines the types of adverse health effects associated with chemical exposures, and the relationship between magnitude of exposure (dose) and severity of effect (response). *Risk Characterization* - summarizes and combines outputs of the exposure and toxicity assessments to provide a quantitative assessment of Site-related risks.

#### Hazard Identification

EPA conducted a baseline risk assessment to evaluate the potential risks to human health associated with the Site in its current state. Although the risk assessment evaluated many contaminants identified in the groundwater and soils, the conclusions of the risk assessment indicate that the significant risks are limited to tetrachloroethene (PCE) and trichloroethene (TCE) in the groundwater at the Site, primarily through the ingestion by current off-Site and future on-Site residents. This section of the decision summary will focus on the risks associated with these contaminants in the groundwater. A summary of the concentrations of the contaminants of concern in the groundwater is provided in Table 1.

#### Exposure Assessment

EPA's baseline risk assessment addressed the potential risks to human health by identifying several potential exposure pathways by which the public may be exposed to contaminant releases at the Site under current and future land use and groundwater use conditions. The Site is currently an active commercial establishment with adjacent residential properties. Future use of the Site will likely remain commercial/residential, based on historical land use, surrounding property use, current zoning, and future plans for redevelopment. Therefore, the baseline risk assessment focused on health effects for populations typically associated with this type of commercial facility, as well as off-Site and potential on-Site future residents. Although most residents living near the Site were connected to the public water supply several years ago, a few residents continue to use private wells for either drinking or irrigation. The groundwater at the Site is also designated by the State as a potable water supply, meaning it could be available for drinking in the future. Exposure to groundwater and soil on the Iceland Coin Laundry Company property was evaluated for current and future workers and potential future on-Site residents (adults and children). Exposure to groundwater was evaluated for current and future off-Site residents. Additionally, exposure to Site soil was evaluated for the future construction worker.

A comparison of concentrations of PCE and TCE in groundwater to conservative health-based screening values found in the 2002 EPA Draft Guidance for Evaluation the Vapor Intrusion to Indoor Air Pathway from Groundwater to Soil indicates that there is the potential for vapor intrusion into on-site buildings. Therefore, additional investigation of the vapor intrusion pathway at the Site is necessary and will occur during the remedial phase.

For all media, the reasonable maximum exposure, which is the greatest exposure that is likely to occur at the Site, was evaluated. Table 2 presents all exposure pathways considered in the risk assessment, and the rationale for the inclusion of each pathway. Exposure media, exposure points, and characteristics of receptor populations are also included.

#### **Toxicity Assessment**

Under current EPA guidelines, the likelihood of carcinogenic (cancer-causing) and noncarcinogenic (systemic) effects due to exposure to Site chemicals are considered separately. Consistent with EPA guidance, it was assumed that the toxic effects of the Site-related chemicals would be additive. Thus, carcinogenic and noncarcinogenic risks associated with exposures to individual contaminants of concern were summed to indicate the potential risks associated with mixtures.

Noncarcinogenic risks were assessed using a hazard index (HI) approach, based on a comparison of expected contaminant intake and safe levels of intake (reference doses and inhalation reference doses). Reference doses (RfDs) and inhalation reference doses (RfDis) have been developed by EPA for indicating the potential for adverse health effects. RfDs and RfDis, which are expressed in units of milligrams per kilogram per day (mg/kg-day), are estimates of daily exposure levels for humans thought to be safe over a lifetime (including sensitive individuals).

Estimated intakes of chemicals from environmental media (e.g., the amount of a chemical vapor inhaled) are compared with the RfD or RfDi to derive the hazard quotient for the contaminant in the particular medium. The HI is derived by adding the hazard quotients for all compounds within a particular medium that impact a particular receptor population.

An HI greater than 1 indicates that the potential exists for noncarcinogenic health effects to occur because of Site-related exposures. The HI provides a useful reference point for gauging the potential significance of multiple contaminant exposures within a single medium or across media. The toxicity values, including reference doses and inhalation reference doses for the contaminants of potential concern at the Site, are presented in Table 3.

Potential carcinogenic risks were evaluated using the cancer slope factors developed by EPA for the contaminants of potential concern. Cancer slope factors (SFs) and inhalation cancer slope factors (SFis) have been developed for estimating excess lifetime cancer risks associated with exposure to potentially carcinogenic chemicals. SFs and SFis, which are expressed in units of (mg/kg-day)<sup>-1</sup>, are multiplied by the estimated intake of a potential carcinogen, in mg/kg-day, to generate an upper-bound estimate of the excess lifetime cancer risk associated with exposure to the compound at that intake level. The term "upper bound" reflects the conservative estimate of the risks calculated from the SF or SFi. Use of this approach makes the underestimation of the risk highly unlikely. The SF and SFi values used in this risk assessment for PCE and TCE are presented in Table 4.

#### **Risk Characterization**

The quantitative hazard and risk calculations were based on reasonable maximum exposure scenarios. These estimates were developed by taking into account various conservative assumptions about the likelihood of a person being exposed to these media. Risk characterization involved integrating the exposure and toxicity assessments into quantitative expressions of carcinogenic risks and noncarcinogenic health effects. Specifically, chronic daily intakes were compared with concentrations known or suspected to present carcinogenic risks or noncarcinogenic health hazards.

For known or suspected carcinogens, risks are generally expressed as the incremental probability of an individual developing cancer over a lifetime as a result of exposure to a carcinogen. These risks are probabilities that usually are expressed in scientific notation (such as  $1 \times 10^{-4}$ ). An excess lifetime cancer risk of  $1 \times 10^{-4}$  indicates that one additional incidence of cancer may occur in a population of 10,000 people who are exposed under the exposure conditions identified in the BHHRA. As stated in the NCP, the acceptable risk range for site-related exposure is  $10^{-4}$  to  $10^{-6}$  (or approximately one in 10,000 to one in one million).

Excess lifetime cancer risks estimated at the Site are presented in Table 5. At the Iceland Coin Laundry Site, the excess lifetime cancer risk for the current/future off-Site adult resident is 7 x  $10^{-4}$ , for the current/future off-Site resident child it is 5 x  $10^{-4}$ , for the current/future Site worker it is 2 x  $10^{-4}$ , for the future on-Site adult resident it is 1 x  $10^{-3}$ , for the future on-Site child resident it

is 8 x  $10^{-4}$  4. Ingestion of groundwater is the primary pathway of concern, and PCE and TCE are driving the risk.

The noncarcinogenic HIs for PCE and TCE are presented in Table 6. At the Iceland Coin Laundry Site, HI values are 1 for the current/future off-Site adult resident, 3 for the current/future off-Site child resident, 1 for the future on-Site adult resident, and 4 for the future on-Site child resident. Ingestion of groundwater is the primary pathway of concern, and PCE and TCE are responsible for driving the HIs above 1.

Based on the HHRA, PCE and TCE in groundwater are the major chemicals of concern for human health associated with the Iceland Site. These quantitative estimates of risk and hazard exceed EPA's acceptable cancer risk range and the HI threshold of 1, indicating that there is significant potential risk to populations from direct exposure to groundwater.

## **Uncertainties**

The procedures and inputs used to assess risks in this evaluation, as in all such assessments, are subject to a variety of uncertainties. In general, the main sources of uncertainty include:

- environmental chemistry sampling and analysis
- environmental parameter measurement
- fate and transport modeling
- exposure parameter estimation
- toxicological data

Uncertainty in environmental sampling arises in part from the potentially uneven distribution of chemicals in the media sampled. Consequently, there is uncertainty as to the actual levels present. Environmental chemistry-analysis error can stem from several sources, including the errors inherent in the analytical methods and characteristics of the matrix being sampled.

Fate and transport modeling is also associated with a certain level of uncertainty. Factors such as the concentrations in the primary medium, rates of transport, ease of transport, and environmental fate all contribute to the inherent uncertainty in fate and transport modeling.

Uncertainties in the exposure assessment are related to estimates of how often an individual would actually come in contact with the chemicals of concern, the period of time over which such exposure would occur, and in the models used to estimate the concentrations of the chemicals of concern at the point of exposure.

Uncertainties in toxicological data occur in extrapolating both from animals to humans and from high to low doses of exposure, and from the difficulties in assessing the toxicity of a mixture of chemicals. These uncertainties are addressed by making conservative assumptions concerning risk and exposure parameters throughout the assessment. As a result, the risk assessment provides upper-bound estimates of the risks to populations near the Site, and is highly unlikely to underestimate actual risks related to the Site.

More specific information concerning public health and environmental risks, including a quantitative evaluation of the degree of risk associated with various exposure pathways, is presented in the risk assessment report.

Actual or threatened releases of hazardous substances from this Site, if not addressed by implementing the response action selected in the ROD, may present an imminent and substantial endangerment to the public health, welfare, or the environment.

## **Ecological Risk Assessment**

The potential exposure to chemicals in surface soil by small mammals, through ingestion of vegetation, was considered in the screening-level ecological risk assessment. The Site consists of an area of mowed grass and a driveway with no vegetation. There are no exposure pathways between the Site and the Parvin Branch, approximately 1,000 feet northwest of the Site or the wetlands of the Maurice River approximately 7,000 feet from the Site. The leading edge of the groundwater plume is approximately 90 feet beneath the ground surface so it is unlikely that the Site-related contaminants will migrate up into wetlands and floodplains of the Maurice River. Long term ground water monitoring would be conducted to confirm that the plume does not impact the Maurice River and its floodplains. The potential for risks to small mammals was identified for PCE and TCE at the maximum concentrations. These risks; however, were deemed to be insignificant given the following Site-specific conditions and assessment uncertainties:

- Lack of a significant habitat on or next to the Site,
- High degree of human activity in the Site vicinity,
- Impermeable surfaces, buildings, etc. covering surface soils, and
- Conservative exposure assumptions related to diet, home range, and exposure point concentrations.

The Site offers limited habitat value to wildlife since it is within a highly urbanized location and contains very little vegetation or open space. This is also likely to be the case under the future scenario. Therefore, no further action is recommended regarding ecological receptors at the Site

# **REMEDIAL ACTION OBJECTIVES**

Remedial Action Objectives (RAOs) are specific goals to protect human health and the environment. These objectives are based on available information and standards such as applicable or relevant and appropriate requirements (ARARs) and risk-based levels established in the risk assessment.

The overall remediation goal for the Site is to protect human health and the environment. Several RAOs were identified to mitigate the potential risks associated with the Site.

#### **Basis and Rationale for RAOs**

The risk assessment identified COPCs for both soil and groundwater, however the soil COPCs were not related to on-Site processes and did not contribute significantly to Site risk levels. Additionally, no COPCs occurred above screening criteria in soils. The risk assessment concluded that nearly all of the Site risk is currently driven by the presence of PCE and TCE in groundwater, indicating the most significant Site impact has been to groundwater. As a result, soil RAOs were not developed for the Site.

The groundwater at the Site is designated as Class II-A, which at the current water quality is potable groundwater with conventional water supply treatment. The RAOs for groundwater at the Site are as follows:

- Prevent ingestion of, and dermal contact with, contaminated groundwater having concentrations in excess of cleanup criteria
- Restore the groundwater aquifer system to the cleanup criteria within a reasonable timeframe
- Prevent vapor intrusion of the VOCs into the Facility or buildings at the source area.

#### **Groundwater Cleanup Criteria**

The following cleanup criteria were selected based on federal or state promulgated regulations, including:

- PCE	1 ppb
- TCE	1 ppb
- cis-l, 2-DCE	70 ppb

Cleanup criteria were derived from the Applicable or Relevant and Appropriate Requirements (ARARs) identified for the Site and the list of Site-specific COPCs. New Jersey groundwater quality standards, which are applicable for the Site, were used to develop the cleanup criteria. Other COPCs, such as bromodichloromethane, and chloroform, are not Site related. PCE and TCE in groundwater are the primary risk drivers at the Site and TCE and cis-DCE are degradation products of PCE.

Six metals were also defined as groundwater COPCs in the risk assessment and exceeded ARAR concentrations, however, because they are not related to past Site activities and their presence does not contribute significantly to Site risk, the remedial alternatives to be developed and evaluated for the Site do not address metals in groundwater for the purpose of achieving cleanup criteria. Additional VOCs and metals were identified in the risk assessment as COPCs based on concentrations that exceeded screening criteria; however, their concentrations did not exceed ARAR levels, and they are not significant contributors to risk levels at the Site.

Aluminum, iron, and manganese are common metals in groundwater and their concentrations vary depending on the aquifer formation. The sample results for these three metals vary significantly between round I and round 2 sampling, reflecting the natural variation of metal concentrations in groundwater. Mercury concentrations exceeded the NJGQC in both the upgradient well and a well several thousand feet downgradient from the laundry facility. Analytical results suggest that the contamination is localized. The cause of these elevated concentrations is not known, yet the contamination is not related to past Site activities. Metals concentrations can be monitored during the remedial action period. If monitoring results indicate that metals contamination poses an unacceptable risk to human health, remediation of metals can be evaluated.

## Area of Contamination To Be Remediated

As described earlier, contamination originating from the Facility has formed a PCE plume more than 4000 feet long, more than 2000 feet wide, and as deep as 110 feet bgs at MW-11I. The center of the plume has separated from the source area (the Facility) and was. detected near monitoring well MW-07. Contaminant concentrations, in most portions of the plume are very low, at concentrations below 10 ppb. Based on the information collected during the RI, PCE and TCE concentration contours have been developed. The 10 ppb PCE contour, is approximately 1800 feet long and 500 feet wide. The vertical extent of the plume within this contour is about 40 feet. A design investigation could be performed to fully delineate the horizontal and vertical boundaries of the groundwater with PCE concentrations exceeding 10 ppb.

During the RI, relatively high concentrations of PCE, TCE and cis-1,2 DCE were detected in a grab sample (GS-02-18) near the former cesspool area. This area will be investigated during the design investigation. If contamination significantly higher than the cleanup criteria is detected, the cesspool area will be included in the remedial design and will be remediated.

# **DESCRIPTION OF ALTERNATIVES**

CERCLA and the NCP require that each remedial alternative be protective of human health and the environment, be cost effective, comply with other statutory laws, and utilize permanent solutions and alternative treatment technologies and resource recovery technologies to the maximum extent practicable. In addition, the statute includes a preference for the use of treatment as a principal element for the reduction of toxicity, mobility or volume of hazardous substances.

#### **Common Elements**

With the exception of the No Action Alternative the four remaining alternatives include the following components:

<u>Groundwater Sampling and design investigation</u> As discussed in previous sections, the contaminant plume is relatively mobile at the Site. Groundwater sampling will be necessary to define the most current plume conditions and collect groundwater and treatment data necessary to support the design and implementation of the remedial action.

#### Institutional Controls

Institutional controls would use groundwater Classification Exception Area and well drilling restrictions to eliminate human exposure pathways to contaminated groundwater. NJDEP would be responsible for the enforcement of the institutional controls.

Long-term Groundwater Monitoring A long-term groundwater monitoring program would be implemented, including annual groundwater sample collection from existing monitoring wells.

#### Potable Water Supply

If during implementation, residences or businesses within the aerial extent of the Site plume are found to have not yet been connected to public water, EPA would consider connecting them to the public water supply.

#### Vapor intrusion pathway evaluation

The evaluation of the potential risk from vapor intrusion pathway will be evaluated in buildings at and near the former source area.

#### **Remedial Alternatives**

The "construction time" for each alternative reflects only the time required to construct or implement the remedy and does not include the time required to design the remedy. It generally takes 1-2 years for planning, design and procurement before subsequent construction of the remedial alternative. The "construction time" for each alternative reflects only the time required to construct or implement the remedy and does not include the time required to design the remedy.

#### **Alternative 1 - No Action**

Estimated Capital Cost:	\$0
Estimated Annual Operation & Maintenance Cost:	\$0
Estimated Present Worth Cost:	\$0
Estimated construction Time:	None

The No Action alternative was retained for comparison purposes as required by CERCLA and the National Contingency Plan. It will act as a baseline to which other alternatives are compared. No remedial action would be implemented as part of this alternative. It does not include any institutional control or monitoring program.

Because this alternative would result in hazardous substances, pollutants, or contaminants remaining at the Site above levels that allow for unlimited use and unrestricted exposure of

groundwater, EPA would review such action at least every five years. Costs for five-year reviews are not included in the present worth evaluation.

#### **Alternative 2 - Institutional Controls and Long-term Monitoring**

Estimated Capital Cost:		38,700
Estimated Annual Operation & Maintenance Cost:	\$	120,000
Estimated Present Worth Cost:		,770,000
Estimated construction Time:		years

Institutional controls, long term monitoring, five-year reviews, and vapor intrusion evaluation would be implemented as described under Common Elements (located above).

This alternative would continue as long as contaminant concentrations in groundwater are above the cleanup criteria. The groundwater at the Site is under aerobic conditions. PCE would not biodegrade under aerobic conditions. Therefore, it relies on natural processes such as diffusion, dispersion, and dilution to reduce contaminant concentrations. If contaminant concentrations remain greater than the cleanup criteria during migration, they are expected to be reduced to below the cleanup criteria through dilution once the contaminant plume enters the river.

Because this alternative would result in hazardous substances, pollutants, or contaminants remaining at the Site above levels that allow for unlimited use and unrestricted exposure of groundwater, EPA would review such action at least every five years. Costs for five-year reviews are not included in the present worth evaluation.

#### Alternative 3 - In-Situ Physical/Chemical Treatment/In-Situ Biological Treatment

Estimated Capital Cost:	\$ 5,500,000
Estimated Annual Operation & Maintenance Cost:	\$ 520,000
Estimated Present Worth Cost:	\$10,740,000
Estimated Construction Time:	2 years

In-situ treatment allows the treatment of contaminated groundwater in the subsurface, thereby generally avoiding technical and regulatory considerations related to groundwater effluent discharge requirements. For this alternative, groundwater circulation well (GCW) technology would be used to treat the area represented by the PCE 10 ppb contour at the Site, and Enhanced Anaerobic Biological (EAB) treatment would be used at the Facility if localized contamination is confirmed. For areas outside of the 10 ppb contour line, contaminants would be allowed to attenuate through monitored natural attenuation.

Institutional controls and long-term monitoring, as described above, would also be implemented to track the migration and concentration changes of contaminants and to ensure protection of human health.

GCW, alternatively known as in-well vapor-stripping, is an in-situ remediation technology that integrates the principles of groundwater re-circulation with air stripping of volatile organic compounds. Groundwater is extracted from the deep screen interval of the well, treated by air stripping or carbon adsorption within the well, and then discharged at the shallow screen interval of the well back to the formation. This technology induces vertical flow within the aquifer, and potentially increases the transport of contaminants from low permeable zones into relatively high permeable zones, subsequently increasing the pumping efficiency compared to traditional pump-and-treat systems and reduces the clean up time.

If the presence of possible very small and localized groundwater and/or soil contamination at the southeast corner of the Facility is confirmed, EAB treatment would be applied to only this area to treat the contamination. Depending on the area that requires treatment, electron donors and nutrient amendments could be injected into the subsurface from a few injection wells. These injection wells would be screened within the zone of contamination. Since the treatment area is small and no high soil residual contamination is expected, it is estimated that two applications of nutrient amendments would destroy all contaminants in the treatment zone. The specific nutrient amendments to be used in the remedial action would be determined during remedial design.

The treatment zone is expected to be 60 feet long, 20 feet wide, and 18 feet bgs. The vertical extent of the treatment zone is estimated to be 20 feet. Four injection wells spaced 15 feet apart are assumed. After the remedial action is complete, a round of soil and groundwater sampling would be performed to verify the effectiveness of the in-situ biological treatment approach.

Institutional controls, long term monitoring, and vapor intrusion evaluation would be implemented as described under Common Elements (located above).

The duration of. this alternative would depend on the actual performance of the GCWs. If the GCWs perform as designed, the contaminant concentrations within the 10 ppb plume contour line may be reduced to below cleanup criteria in approximately 10 years. The duration of in-situ enhanced biodegradation near the source area would likely be completed in a year. The remaining contamination in the aquifer outside the treatment area would be continuously monitored until the contaminant concentrations are reduced to cleanup criteria although the necessity for monitoring will be evaluated over time. The long-term monitoring program is assumed to continue for 30 years.

Because this remedy will not result in hazardous substances, pollutants or contaminants remaining on-site above levels that allow for unlimited use and unrestricted exposure after implementation of the remedy, a statutory five-year review is not required. Although five-year reviews are not required by statute in connection with this alternative, it is EPA's policy to conduct five-year reviews until cleanup goals have been achieved.

#### **Alternative 4 - In-Situ Biological Treatment**

Estimated Capital Cost:	\$4,970,000
Estimated Annual Operation & Maintenance Cost:	\$ 220,000
Estimated Present Worth Cost:	\$8,130,000
Estimated Construction Time:	2 years

This alternative consists of in-situ treatment of contaminated groundwater through enhanced anaerobic biological (EAB) treatment. PCE and TCE could be effectively biodegraded through reductive dechlorination under anaerobic conditions. The RI results indicate that the groundwater is under aerobic conditions, which is not suitable for naturally occurring biodegradation of PCE. However, the groundwater velocity at the Site is very slow. Nutrient amendments would be injected into the area with relatively high contaminant concentrations and alter the conditions to promote anaerobic degradation of PCE to cis-DCE and/or methane, ethane and ethene. The break down products, cis-DCE and vinyl chloride (VC), can also be degraded under aerobic conditions. No VC was detected at the Site during the RI, and cis-DCE was exhibited at a concentration greater than the PRG at only one location. In-situ biological treatment would be effective for contamination remediation both within the plume area and at the Facility area.

The primary objective of this alternative is to deliver bioremediation nutrient amendments to the subsurface in the most cost effective and efficient configuration in order to stimulate in-situ degradation of contaminants. The biological treatment would be implemented to treat the area represented by the PCE 10 ppb contour at the Site. For areas outside of the 10 ppb contour line, contaminants would be allowed to attenuate through monitored natural attenuation.

Delivery of nutrient amendments to the subsurface can be accomplished in a variety of ways and a delivery strategy will be developed during design. Commercially available electron donors come in both solid and liquid forms and vary considerably with respect to longevity.

Temporary aboveground piping and hoses would be used to distribute the amendment to the injection wells. A trailer mounted distribution system would be used for injection to all the wells in a given row simultaneously, and two water trucks would be used to transport potable water from a metered hydrant.

Once injection to all seven rows of injection wells has been completed (Figure 7), the temporary injection equipment would be removed and no activity would be required other than periodic groundwater monitoring for 3 years. It is assumed that an additional full-scale injection event would take place at the end of year three.

If the design investigation confirms that contamination adjacent to the Facility requires treatment, EAB would also be performed in this area.

Chlorinated solvents have successfully been degraded by the addition of an electron donor at many Sites. At Sites similar to this one, the degradation has been observed to "stall" at cis-DCE instead of proceeding all the way to ethene. If this occurs, one mitigation strategy that has been used at other Sites is to perform bioaugmentation, which is the addition of exogenous bacteria that are capable of complete dechlorination of contaminants.

Unlike PCE, cis-DCE is susceptible to multiple degradation pathways, including direct and co-metabolic oxidation, and abiotic reduction. Accordingly, the cis-DCE produced from PCE degradation would be expected to decrease below the PRG under intrinsic conditions and bioaugmentation would not be required.

Once the desired endpoint has been achieved the Injection well network will be abandoned in accordance with state guidelines.

Institutional controls, long term monitoring, and vapor intrusion evaluation would be. implemented as described under Common Elements (located above).

The estimated duration for active remedial action using EAB is up to nine years based on the injection point spacings, the groundwater flow estimates, and experiences at other Sites. However, the long-term monitoring program is expected to be carried out until year 30 at this Site, because the treatment zone is bounded by the 10 ppb PCE contour line; groundwater outside the treatment area could persist above the cleanup criteria for longer than 9 years. The periodic reviews are assumed to continue for 30 years although the necessity for monitoring will be evaluated over time.

Because this remedy will not result in hazardous substances, pollutants or contaminants remaining on-site above levels that allow for unlimited use and unrestricted exposure after implementation of the remedy, a statutory five-year review is not required. Although five-year reviews are not required by statute in connection with this alternative, it is EPA's policy to conduct five-year reviews until cleanup goals have been achieved.

#### **Alternative 5 - Pump-and-Treat**

Estimated Capital Cost:	\$ 4,630,000
Estimated Annual Operation & Maintenance Cost:	\$ 560,000
Estimated Present Worth Cost:	\$13,160,000
Estimated Construction Time:	2 years

Alternative 5 consists of pumping groundwater via extraction wells to a groundwater treatment system, with subsequent recharge of treated water through surface recharge structures. Pumping may be continuous or pulsed to allow equilibration of contaminants within the groundwater.

One row of groundwater extraction wells would be located downgradient of the 10 ppb contaminant contour to intercept the plume. A second row of extraction wells would be located

near the center of the plume to collect currently impacted groundwater from within the 10 ppb contaminant contour, thereby accelerating the cleanup process. Extracted groundwater would be treated through liquid phase carbon adsorption. Air-stripper and vapor phase carbon adsorption should also be considered during remedial design. Treated groundwater would be discharged back to the subsurface through surface recharge structures, such as an infiltration gallery. A pump and treat system would be effective in remediating the contamination plume.

If the presence of possible very small and localized groundwater and/or soil contamination at the southeast corner of the Facility is confirmed, EAB treatment would be applied to only this area to treat the contamination. Depending on the area that requires treatment, electron donors and nutrient amendments could be injected into the subsurface from a few injection wells. These injection wells would be screened within the zone of contamination. Since the treatment area is small and no high soil residual contamination is expected, it is estimated that two applications of nutrient amendments would destroy all contaminants in the treatment zone. The specific nutrient amendments to be used in the remedial action would be determined during remedial design.

Two rows of groundwater extraction wells are proposed to contain downgradient migration of contaminants and accelerate the remediation of the plume. The first row of five groundwater extraction wells are located downgradient of the 10 ppb PCE contour line (Figure 7). The second row of six groundwater extraction wells is located in the center of the 10 ppb PCE contour line. For areas outside the 10 ppb contour line, contaminants would be allowed to attenuate through the natural process.

It was assumed that the groundwater treatment system would consist of bag filtration and liquid phase carbon adsorption.

Two treatment systems, one for each row of extraction wells, would be used. Leasing of private land would be necessary for these two treatment plants. Treated water would be discharged through an infiltration gallery located side-gradient of the plume. Effluent of the treatment system would be sampled and analyzed periodically to verify compliance with the NJDEP groundwater discharge requirements. Results from long-term groundwater monitoring would be used to evaluate the performance and to adjust operating parameters for the pump-and-treat system, as necessary.

Institutional controls, long term monitoring, and vapor intrusion evaluation would be implemented as described under Common Elements (located above).

The pump and treat system is designed to extract the contaminated groundwater with contaminant concentrations greater than 10 ppb and treat the groundwater ex situ. The groundwater velocity is slow at the Site; it would take a long time to flush one pore volume within the 10 ppb PCE contour line. To remediate the contamination, several pore volumes would be needed. Based on experience from other Sites, the pump-and-treat system would likely be operated for greater than 30 years.

Because this remedy will not result in hazardous substances, pollutants or contaminants remaining on-site above levels that allow for unlimited use and unrestricted exposure after implementation of the remedy, a statutory five-year review is not required. Although five-year reviews are not required by statute in connection with this alternative, it is EPA's policy to conduct five-year reviews until cleanup goals have been achieved.

## **COMPARATIVE ANALYSIS OF ALTERNATIVES**

In selecting a remedy, EPA considered the factors set out in CERCLA § 121, 42 U.S.C. § 9621, by conducting a detailed analysis of the viable remedial response measures pursuant to the NCP, 40 CFR § 300.430 (e) (9) and OSWER Directive 9355.3-01. The detailed analysis consisted of an assessment of the individual response measures against each of nine evaluation criteria and a comparative analysis focusing upon the relative performance of each response measure against the criteria.

## THRESHOLD CRITERIA

The first two criteria are known as "threshold criteria" because they are the minimum requirements that each response measure must meet to be eligible for selection as a remedy

#### **1. Overall Protection of Human Health and the Environment**

Alternative 1 would not be protective of human health and the environment. Alternative 2 would be protective of human health through institutional controls but would not be protective of the environment. Alternatives 3, 4 and 5 would be equally protective of human health and the environment and would achieve the RAOs. Alternative 4 is expected to achieve RAOs in the shortest time, followed by Alternative 3. Alternative 5 would require the longest time of operations among these three alternatives.

For Alternative 4, the biodegradation process would be closely monitored to ensure complete breakdown of biodegradation byproducts occurs. Accumulation of byproducts is very rare and not anticipated. If the reductive dechlorination stalls, the treatment can be augmented.

#### 2. Compliance with Applicable or Relevant and Appropriate Requirements (ARARS)

Alternatives 1 and 2 would not attain the ARARs in a reasonable time frame. Alternatives 3, 4, and 5 would attain the ARARs within the treatment areas through active treatment, while the contamination outside of the treatment zones would be attenuated by natural mechanisms. All alternatives would comply with location- and action-specific ARARs.

## PRIMARY BALANCING CRITERIA

The next five criteria are known as "primary balancing criteria". These criteria are factors with which tradeoffs between response measures are assessed so that the best option will be chosen, given Site-specific data and conditions.

## 3. Long-term effectiveness and performance

Alternatives 1 and 2 would not have long-term effectiveness and permanence, since contaminants would remain in the subsurface and pose potential risks to human health and the environment. Alternatives 3, 4, and 5 would have long-term effectiveness and permanence through either in-situ or ex-situ treatment. The treatment processes are not reversible.

If pilot testing demonstrates the technologies in Alternatives 3 and 4 are suitable for the Site conditions, these technologies are considered adequate and reliable processes to treat the contamination, since they have been demonstrated successfully at other sites.

#### 4. Reduction of toxicity, mobility or volume (T/M/V).

Alternatives 1 and 2 would not reduce the Toxicity/Mobility/Volume (T/M/V), since no active in-situ or ex-situ treatment would be implemented. The total volume of contaminated groundwater would increase as contaminants migrate downgradient. Alternatives 3, 4, and 5 would reduce the T/M/V through physical, chemical or biological processes.

#### **5. Short Term Effectiveness**

For Alternative I, protection of the community and workers would not be applicable, as no remedial action would occur. For Alternative 2, there would be minimum short-term inconveniences to the residents. For Alternatives 3, 4, and 5, there would be some short-term inconveniences due to the scope of the field operations. Alternative 5, Pump and Treat, would require significant land acquisition, and disturbance of private and public properties as collection wells and their associated pumping units, electrical controls, clean-outs, valves, vaults, lateral double-walled piping are installed above and below the ground surface in a residential area. However, no major adverse impacts would be expected.. Air monitoring, engineering controls, and appropriate worker personal protective equipment(PPE) would be used to protect the community and workers for Alternatives 2 through 5.

For Alternatives 3 and 4, tree removal would be required to access well locations. Consent from property owners would be obtained prior to any field work.

The timeframe to accomplish the active remediation for Alternative 4 is anticipated to be shorter than for Alternative 3 based on experience at other sites. Alternative 5 would be operated for a long time due to relatively slow groundwater velocity at the Site. In the absence of groundwater modeling, it would be difficult to configure the optimal layout of groundwater extraction wells within the treatment area and predict the operational timeframe.

For Alternative 4, in-situ bioremediation, the selected amendment would be injected into the subsurface and exist in the groundwater for more than 6 years. Although this amendment is food grade, it may still not be desirable to use this groundwater as drinking water. Currently, only one residence is using groundwater as drinking water. This house is located outside of the treatment

area and the PCE level is below the federal drinking water standard. If it is impacted, EPA would consider connecting them to public water.

## 6. Implementability

## Technical Feasibility

Alternative 1 would be easiest to implement since no action would be taken. Alternative 2 would be the second easiest to implement. Alternatives 3 and 4 would require a pilot study since both involve innovative technologies. Both Alternatives 3 and 5 are technically more difficult to implement than the other alternatives. Optimum groundwater extraction rates would need to be determined during design and a higher volume of groundwater pumping may be required to attain goals.

Groundwater treatment, operation and maintenance and discharge requirements for Alternatives 3 and 5 are technically more difficult to implement than other alternatives especially in a residential area.

## Administrative Feasibility

Alternatives 3, 4, and 5 may be administratively difficult to implement because leasing or purchasing of private land would be necessary, and community acceptance of the treatment methodologies and locations of the treatment systems would likely be more difficult than the limited action or no action alternatives. Installation of underground piping, pumps, and groundwater extraction/injection wells would be difficult in a residential area.

## Availability of Services and Materials

Alternative 1 would not require any services or materials. Alternatives 2-5 would require common construction services and materials for implementation of the remedy.

## 7. Cost

The present worth for Alternative 5 (\$13.11 million) is the highest, followed by Alternative 3 (\$10.69 million), and then Alternative 4 (\$8.13 million). Alternative 2 (\$1.77 million) has the lowest present worth since it involves no treatment. The costs associated with Alternative 5 are based on a total pumping rate of 110 gallons per minute which could increase significantly when design engineering studies are completed. Alternative 1 has no cost since it involves no action.

## **MODIFYING CRITERIA**

The final two evaluation criteria are called "modifying criteria" because new information or comments from the state or the community on the Proposed Plan may modify the preferred response measure or cause another response measure to be considered.

### 8. State Acceptance

The State of New Jersey concurs with Alternative 4.

## 9. Community Acceptance

The Responsiveness Summary details the public's general response to the response measures described in the Proposed Plan and the RI/FS report. This assessment includes determining which of the response measures the community supports, opposes, and/or has reservations about. EPA solicited input from the community on the remedial response measures proposed for the Site. No comments were received from the public during the public meeting or the 30-day public comment period.

## PRINCIPAL THREAT WASTES

Principal threat wastes are considered source materials, i.e., materials that include or contain hazardous substances, pollutants or contaminants that act as a reservoir for migration of contamination to groundwater, surface water, or as a source for direct exposure. No principal threat wastes were identified during the RI.

## SELECTED REMEDY

Based upon consideration of the results of the Site Investigation, the requirements of CERCLA, a detailed evaluation of the various alternatives, EPA recommends Alternative 4, In-Situ Biological Treatment (Preferred Alternative) for cleanup of the groundwater at the Iceland Coin Laundry Site. Alternative 4 satisfies the requirements of CERCLA section 121 and the National Contingency Plan's nine evaluation criteria for remedial alternatives, 40 CFR section 300.430 (e) (9).

In the selected alternative, amendments such as electron donors and nutrients will be injected into the targeted groundwater plume area to alter the groundwater conditions to promote anaerobic degradation (reductive dechlorination) of PCE, TCE to cis-1, 2-DCE and/or methane, ethane and ethene. The breakdown products, cis-1,2-DCE and vinyl chloride can easily be degraded under existing Site conditions. In-situ biological treatment would be used to remediate the groundwater plume that contains PCE at levels above 10 ppb. For the area outside the 10 ppb isoconcentration contour, natural attenuation would be monitored to ensure the remediation goal is achieved. After some pilot tests are conducted, nutrient amendments would be injected into the groundwater and then monitored, and if required another injection event would occur followed by additional monitoring. Once cleanup objectives are achieved, the wells would be abandoned and sealed when the groundwater has achieved the remediation goals.

Alternative 4, In-Situ Enhanced Biological Treatment is comprised of the following major components:

- In-situ Biological Treatment for cleanup of the groundwater at the Iceland Coin Laundry Site. The in-situ treatment will be an enhanced anaerobic bioremediation (EAB) system.
- In addition, enhanced anaerobic biological treatment at the facility area, if necessary. If the design investigation indicates significant soil contamination adjacent to the source area, EAB will also be performed in this area.
- EAB performance monitoring Monitoring wells would be sampled to ensure that the conditions inside and along the edges of the contaminated area are conducive to biodegradation.
- Institutional controls Institutional controls for groundwater would include a Classification Exception Area (CEA) and well drilling restrictions to eliminate human exposure pathways to contaminated groundwater.
- Long-term groundwater monitoring The long-term monitoring program would track contaminant concentration changes and migration outside the treatment area. The monitoring will be conducted to establish whether contaminants are meeting the appropriate New Jersey Ground Water Quality Standards (NJGWQSs) or Maximum Contaminant Levels (MCLs), whichever is lower.
- If during implementation, residences or businesses within the aerial extent of the Site plume are found to have not yet been connected to public water, EPA would consider connecting them to the public water supply.

## Summary of the Rationale for the Selected Remedy

The estimated cost of Alternative 4 is \$8.1 million. The information in the cost estimate summary table is based on the best available information regarding the anticipated scope of the remedial alternative. Changes in the cost elements are likely to occur as a result of new information and data collected during the engineering design of the remedial alternative. This is an order-of-magnitude engineering cost estimate that is expected to be within +50 to -30 percent of the actual project cost.

The selection of Alternative 4 provides the best balance of tradeoffs among response measures with respect to the nine evaluation criteria. EPA believes that Alternative 4 will be protective of human health and the environment, will be cost effective, and will utilize permanent solutions and alternative treatment technologies or resource recovery technologies to the maximum extent practicable.

# **STATUTORY DETERMINATIONS**

As was previously noted, CERCLA § 121(b)(1) mandates that a remedial action must be protective of human health and the environment, cost-effective, and utilize permanent solutions

and alternative treatment technologies or resource recovery technologies to the maximum extent practicable. Section 121(b)(1) also establishes a preference for remedial actions which employ treatment to permanently and significantly reduce the volume, toxicity or mobility of the hazardous substances, pollutants, or contaminants at a Site. CERCLA § 121(d) further specifies that a remedial action must attain a degree of cleanup that satisfies ARARs under federal and state laws, unless a waiver can be justified pursuant to CERCLA § 121(d)(4).

#### **Protection of Human Health and the Environment**

The Selected Remedy, Alternative 4, will adequately protect human health and the environment through treatment of the contaminated groundwater and, as needed, natural attenuation and deed restrictions. The Selected Remedy will eliminate all significant direct-contact risks to human health and the environment associated with the groundwater. In addition, this action will eliminate and/or reduce any substantial sources of contamination to the groundwater.. This action will result in the reduction of exposure levels to acceptable risk levels within EPA's generally acceptable risk range of 10<sup>-4</sup> to 10<sup>-6</sup> for carcinogens and below an HI of 1 for non-carcinogens. Implementation of the Selected Remedy will not pose unacceptable short-term risks or adverse cross-media impacts.

#### **Compliance with ARARs**

Section 121(d) of CERCLA and the NCP Section 300.430 (f) (1) (ii) (B) require that remedial actions at CERCLA sites at least attain legally applicable or relevant and appropriate Federal and State requirements, standards, criteria, and limitations which are collectively referred to as "ARARs", unless such ARARs are waived under CERCLA section 121(d)(4). During and at the completion of the response action for the contaminated groundwater, the Selected Remedy will meet action-specific, chemical-specific, and location-specific ARARs.

#### **Cost Effectiveness**

In the lead agency's judgment, the Selected Remedy is cost-effective and represents a reasonable value for the money to be spent. In making this determination, the following definition was used: "A remedy shall be cost-effective if its costs are proportional to its overall effectiveness." (NCP § 300.430 (f) (1) (ii) (D)). This was accomplished by evaluating the "overall effectiveness" of those alternatives that satisfied the threshold criteria (i.e., were both protective of human health and the environment and ARAR-compliant). Overall effectiveness was evaluated by assessing three of the five balancing criteria in combination (long-term effectiveness and permanence; reduction in toxicity, mobility, and volume through treatment; and short-term effectiveness). Overall effectiveness was then compared with costs to determine cost-effectiveness. The relationship of the overall effectiveness of this remedial alternative was determined to be proportional to its costs and therefore this alternative represents a reasonable value for the money to be spent.

The total present worth for Alternative 4 is estimated to be \$8.1 million. Alternative 1 was determined not to be an acceptable alternative. Alternative 2 is estimated to cost \$1,770,000, and does not provide any treatment of contaminated groundwater. Alternative 3 is estimated to cost \$10,690,000, and Alternative 5 is estimated to cost \$13.1 million. Although these alternatives are as protective of human health as the selected alternative, the selected alternative is cost effective as it has been determined to provide the greatest overall protectiveness for its present worth costs.

#### **<u>Utilization of Permanent Solutions and Alternative Treatment Technologies</u>**

EPA has determined that the Selected Remedy represents the maximum extent to which permanent solutions and treatment technologies can be utilized in a practicable manner at the Site. Of those alternatives that are protective of human health and the environment and comply with ARARs, EPA has determined that the Selected Remedy provides the best balance of trade-offs in terms of the five balancing criteria, while also considering the statutory preference for treatment as a principal element and bias against off-Site treatment and disposal and considering State and community acceptance. The Selected Remedy satisfies the criteria for long-term effectiveness and permanence by removing all contaminants from the groundwater. The selected remedy does not present short-term risks different from the other alternatives. There are no special implementability issues since the remedy employs standard technologies.

#### **Preference for Treatment as a Principal Element**

Through the use of in-situ biological treatment to treat the contaminated groundwater source of contamination, the Selected Remedy meets the statutory preference for the use of remedies that employ treatment that reduces toxicity, mobility, or volume as a principal element.

#### **<u>Five-Year Review Requirements</u>**

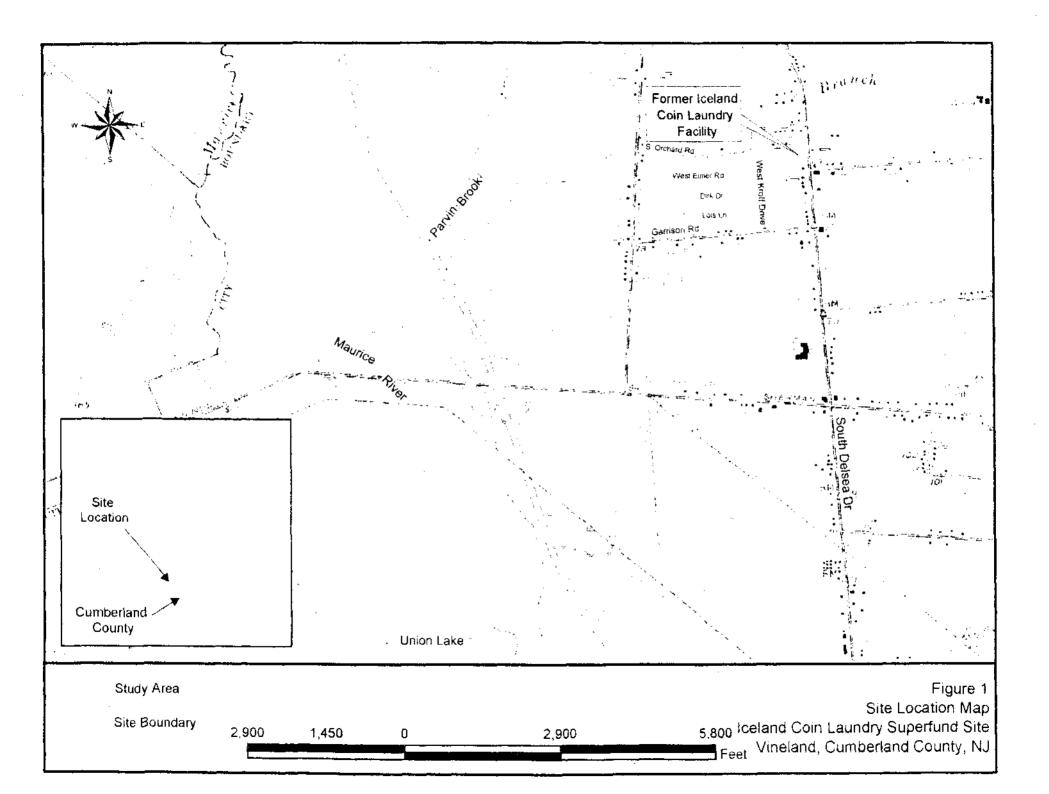
Because this remedy will not result in hazardous substances, pollutants or contaminants remaining on-site above levels that allow for unlimited use and unrestricted exposure after implementation of the remedy, a statutory five-year review is not required. Although five-year reviews are not required by statute in connection with this alternative, it is EPA's policy to conduct five-year reviews until cleanup goals have been achieved to ensure that the remedy is, or will be, protective of human health and the environment.

#### **DOCUMENTATION OF SIGNIFICANT CHANGES**

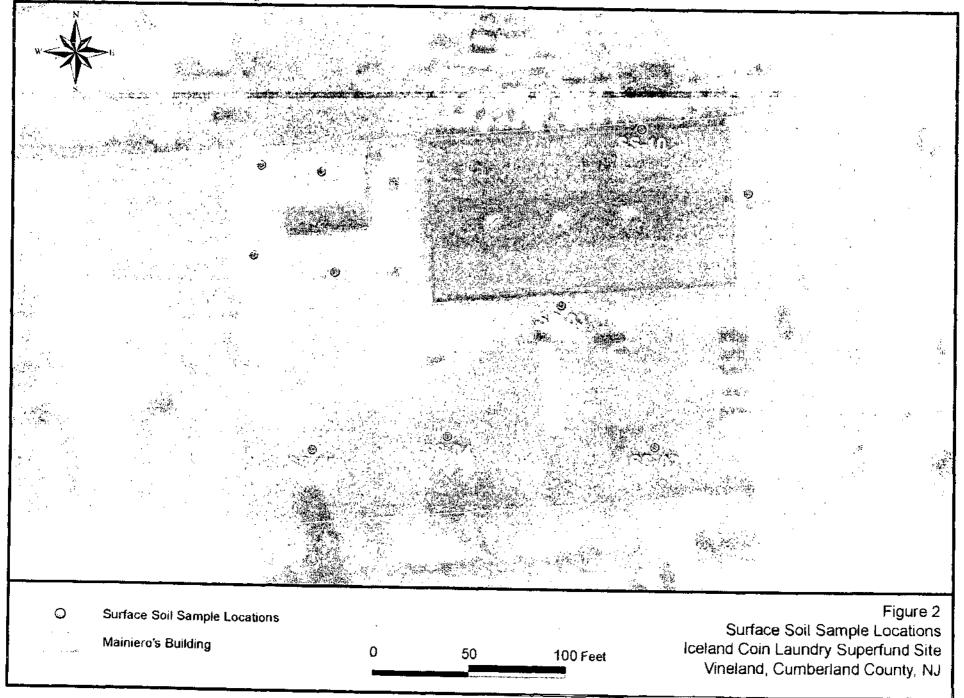
The Proposed Plan for the Iceland Coin Laundry Site was released for public comment on August 5, 2006. The Proposed Plan identified Alternative 4, In-Situ Biological Treatment as EPA's preferred alternative. EPA received no written or verbal comments submitted during the public comment period. It was determined that no significant changes to the remedy, as originally identified in the Proposed Plan, were necessary or appropriate.

## **APPENDIX I**

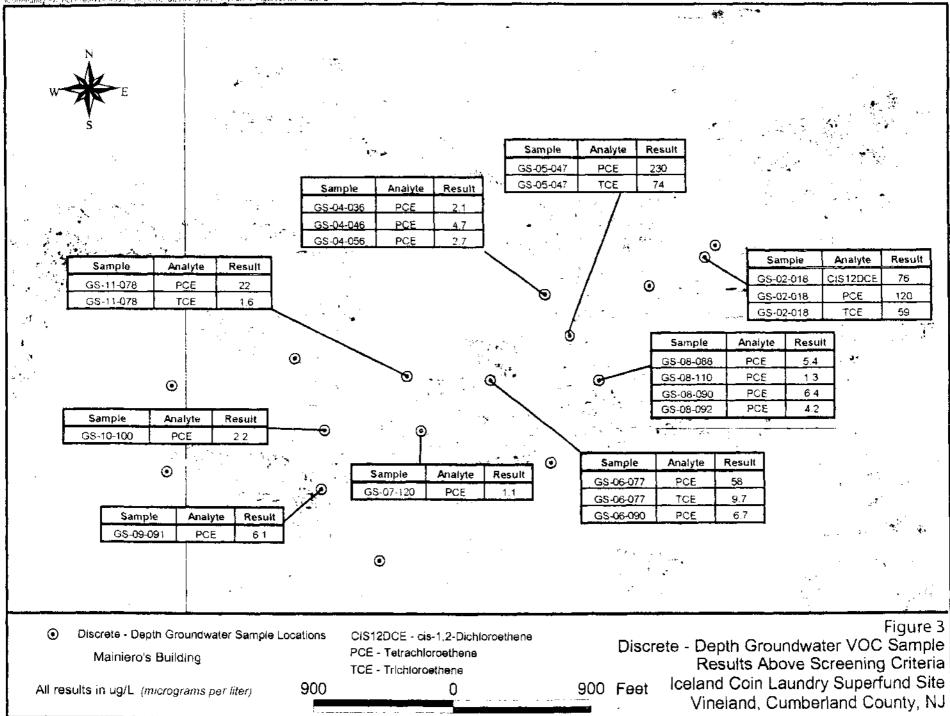
FIGURES

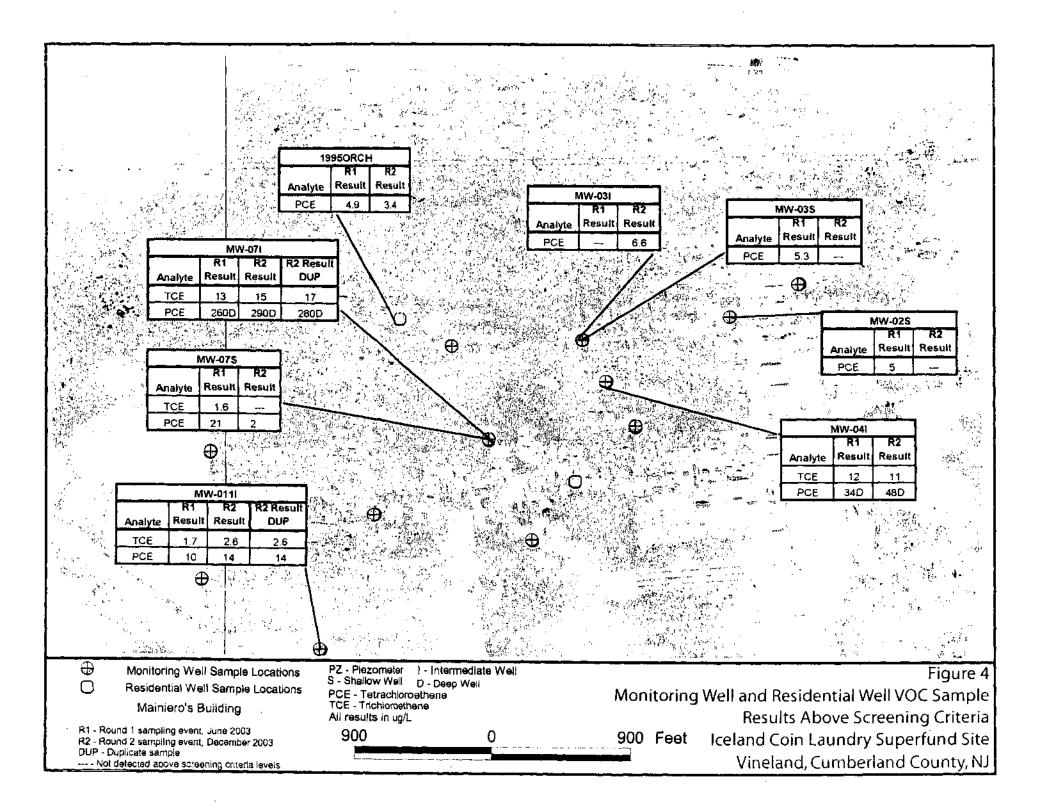


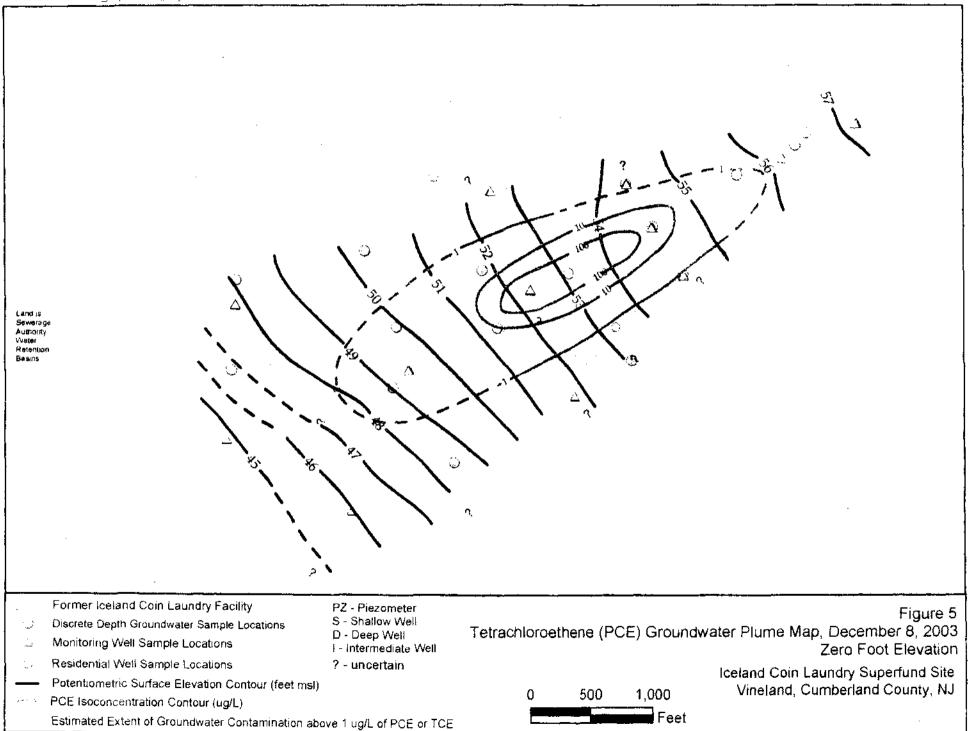
#### C:VMS\GISVceland\GIS\_projects\RIVFigure\_2\_1\_surface\_soil.mxd

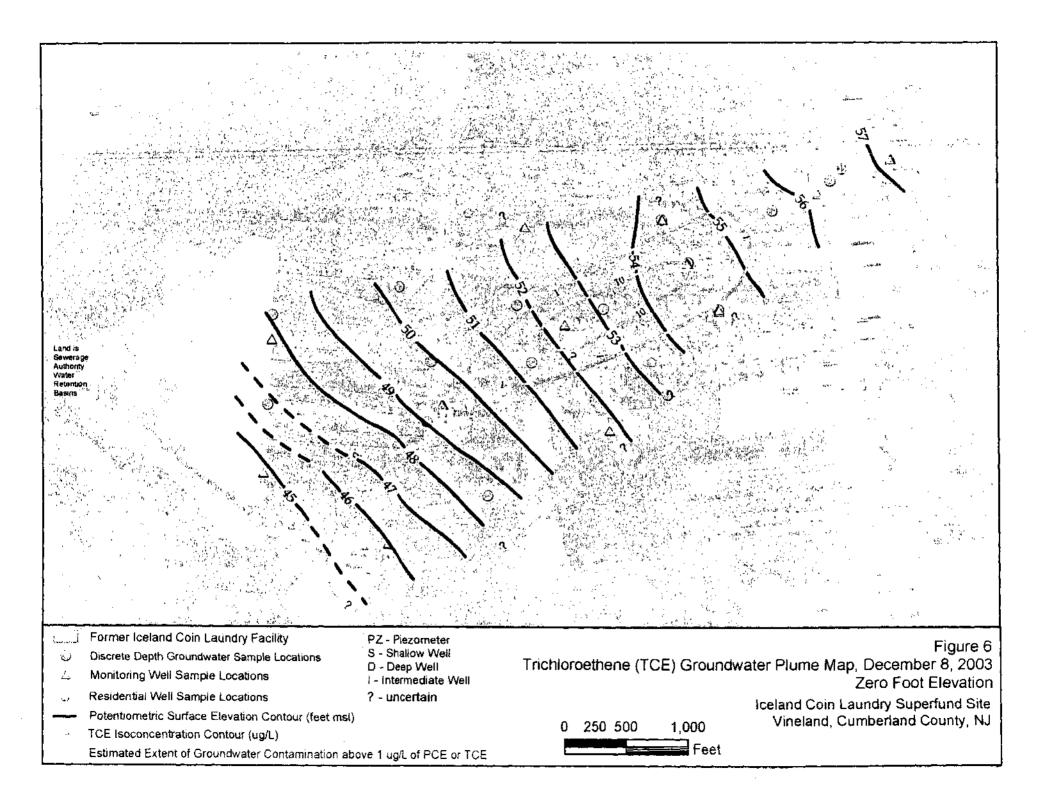


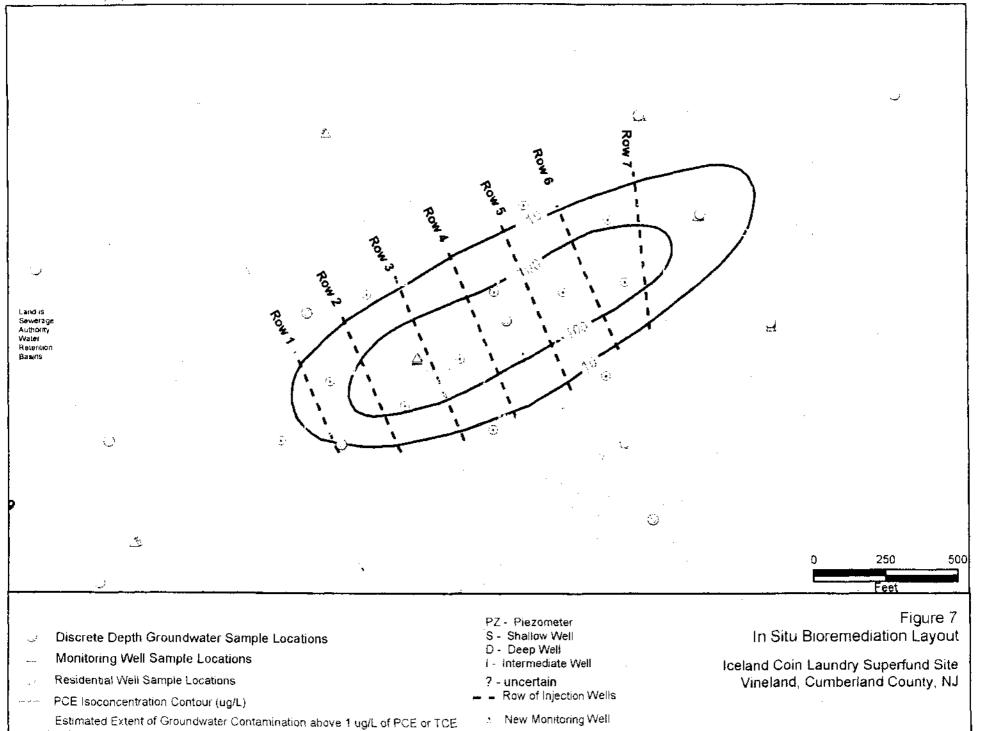












## **APPENDIX II**

## TABLES

#### TABLE 1

#### Summary of Chemicals of Concern and Medium-Specific Exposure Point Concentrations

Future Scenario Time frame: Medium: Groundwater Exposure Medium: Groundwater Chemical of Concentration Conce Frequenc Exposur Exposure Statistical Exposure e Point Point Detected Concern ny of Point Measure tration Detection Concen-Concen-Min Units tration Max tration Units Tap Water Tetrachloroethene 0.19 285 19/40 112 99% Cheb. ug/L ug/L 8 Trichloroethene 0.19 16 ug/L 11/40 ug/L 99% Cheb.

Key

mg/kg: milligram per kilogram; parts per million ug/L: micrograms per liter; part per billion 99% Cheb.: 99% Chebyshev (mean, STD) upper-confidence limit MAX: Maximum value detected

#### Summary of Chemicals of Concern and Medium-Specific Exposure Point Concentrations

The tables present the chemicals of concern (COCs) and exposure point concentration for each of the COCs detected in the groundwater (*i.e.*, the concentrations that will be used to estimate the exposure and risk from each COC in each media). The tables include the range of concentrations detected for each COC, as well as the frequency of detection (i.e., the number of times the chemical was detected in the samples collected at the Site), the exposure point concentration (EPC), and how the EPC was calculated.

	······································				TABLE 2			
				Selection	of Exposure P	athways		
Scenario Time frame	Medium	Exposure Medium	Exposure Point	Receptor Population	Receptor Age	Exposure Route	On-site/ Off-site	Rationale for Selection/Exclusion of Exposure Pathway
Current/ Future	Surface Soil	Surface Soil	Surface Soil	Site worker	Adult	Ingestion Dermal	Onsite	Site workers are exposed to on-Site surface soil.
					Adolescent (12-18 yrs)	Ingestion Dermal	On-Site	Visitors are exposed to on-Site surface soil.
		Air	Air	Site visitor	Adult	Ingestion Dermal	On-Site	Site workers may inhale fugitive dust from surface soil.
					Adolescent (12-18 yrs)	Ingestion Dermal	On-Site	Visitors may inhale fugitive dust from surface soil.
	Groundwat er	Groundwater	Tap Water	Off-Site resident	Adult	Ingestion Dermal	Off-Site	Most of the off-Site residents in the area are connected to the municipal water supply, although
					Child (0-6 yrs)	Ingestion Dermal	Off-Site	a few residents have private wells.
		Air	Water	Off-Site	Adult	Inhalation	Off-Site	
			Vapors at Showerhead	resident	Child (0-6 yrs)	Inhalation	Off-Site	]
			Vapors from	Off-Site	Adult	Inhalation	Off-Site	Off-Site residents will not be exposed to inhalatio
			Subsurface Intrusion	resident	Child (0-6 yrs)	Inhalation	Off-Site	of vapors from subsurface intrusion because there is a large quantity of clean water between groundwater contamination and the top of the water table.
				Site worker	Adult	Inhalation	On-Site	Site workers may be exposed to inhalation of vapors from subsurface intrusion. This pathway was qualitatively discussed in relation to residential screening levels. Additional investigation of this pathway will occur during remedial design.
Future	Surface	Surface Soil	Surface Soil	On-Site	Adult	Ingestion	On-Site	Future on-Site residents may be exposed to on- Site surface soil.

.

44

.

 Soil			Resident		Dermal		
				Child (0-6 yrs)	Ingestion Dermal	On-Site	
			Site Worker	Adult	Ingestion Dermal	On-Site	Future site workers may be exposed to on-Site surface soil.
	Air	Air	On-Site	Adult	Inhalation	On-Site	Future on-Site residents may inhale fugitive dust from surface soil.
			resident	Child (0-6 yrs)	Inhalation	On-Site	irom surface son.
			Site worker	Adult	Inhalation	On-Site	Site workers may inhale fugitive dust from surface soil.
	Surface/ Subsurface Soil	Surface/ Subsurface Soil	Construction Worker	Adult	Ingestion Dermal	On-Site	Construction workers may be exposed to on-Site soil.
		Air	Construction Worker	Adult	Inhalation	On-Site	Construction workers may inhale fugitive dust from surface and subsurface soil.
Groundwat er	Groundwater	Tap Water	On-Site Resident	Adult	Ingestion Dermal	On-Site	Although the site is connected to the municipal water supply, private wells could be installed in
	-			Child (0-6 yrs)	Ingestion Dermal	On-Site	the future for the use of residents.
			Site Worker	Adult	Ingestion Dermal	On-Site	Site workers may be exposed to groundwater from future on-Site private wells while washing hands or using an emergency shower.
	Air	Water	On-Site	Adult	Inhalation	On-Site	Although the site is connected to the municipal
		Vapors at Showerhead	Resident	Child (0-6 yrs)	Inhalation	On-Site	water supply, private wells could be installed in the future for the use of residents.
			On-Site	Adult	Inhalation	On-Site	Residents may be exposed via inhalation of
			Resident	Child (0-6 yrs)	Inhalation	On-Site	vapors from subsurface intrusion
			Site Worker	Adult	Inhalation	On-Site	Site workers may be exposed via inhalation of vapors from subsurface intrusion.

The table presents all exposure pathways considered for the risk assessment, and the rationale for the inclusion of each pathway. Exposure media, exposure points, and characteristics of receptor populations are included.

				TAB	LE 3				
		N	on-Cance	er Toxic	ity Data S	Summary			
Pathway: Inges	tion/Derma	t							
Chemical of Concern	Chronic/ Subchronic	Oral RfD Value	Oral RfD Units	Dermai RfD	Dørmal RfD units	Primary Target Organ	Combined Uncertainty /Modifying Factors	Sources of RfD: Target Organ	Dates of RfD:
Tetrachloroethene	Chronic	1.0e-02	mg/kg- day	1.0e-02	mg/kg- day	Liver	1000	IRIS	7/11/200 5
Trichloroethene	Chronic	3.0e-04	mg/kg- day	3.0e-04	mg/kg- day	Liver, kidney, fetus	3000	NCEA	4/15/200 3
Pathway: Inhal	ation								
Chemical of Concern	Chronic/ Subchronic	Inhalation RfC Value	Inhalation RfC Units	inhalati on RfD	Inhalation RfD units	Primary Target Organ	Combined Uncertainty /Modifying Factors	Sources of RfC/RfD : Target Organ	Dates:
Tetrachloroethene	Chronic	6.0e-01	mg/m³	1.7e-01	mg/kg- day	Liver	30	NCEA	4/15/200 3
Trichloroethene	Chronic	4.0e-02	mg/m³	1.0e-02	mg/kg- day	Central Nervous System	1000	NCEA	4/15/200 3

Key

IRIS: Integrated Risk Information System, U.S. EPA NCEA: National Center for Environmental Assessment, U.S. EPA

#### Summary of Toxicity Assessment

This table provides non-carcinogenic risk information which is relevant to the contaminants of concern. When available, the chronic toxicity data have been used to develop oral reference doses (RfDs).

			TABLE 4						
		Cancer ]	Toxicity Data	Summary					
Pathway: Ingestion, I	Dermal								
Chemical of Concern	Oral Cancer Slope Factor	Units	Adjusted Cancer Slope Factor (for Dermal)	Slope Factor Units	Weight of Evidence/ Cancer Guideline Descriptio n	Source	Date		
Tetrachloroethene	5.4e-01	1/(mg/kg-day)	5.4e-01	1/(mg/kg-day)		CalEPA	1/22/200		
Trichloroethene	4.0e-01	1/(mg/kg-day)	4.0e-01	1/(mg/kg-day)	B1	NCEA	1/22/200		
Pathway: Inhalation									
Chemical of Concern	Unit Risk	Units	Inhalation Cancer Slope Factor	Units	Weight of Evidence/ Cancer Guideline Descriptio n	Source	Date		
Tetrachloroethene	5.9e-06	1/(ug/m <sup>3</sup> )	2.1e-02	1/(mg/kg-day)		CalEPA	12/13/20 3		
Trichloroethene	1.1e-04	1/(ug/m <sup>3</sup> )	4.0e-01	1/(mg/kg-day)	B1	NCEA	8/1/01		
Кеу			EPA Gr	oup:					
CalEPA: California EPA IRIS: Integrated Risk Information System. U.S. EPA National Center for Environmental Assessment, U.S. EPA limited human data are available Indicates sufficient evidence in NCEA: National Center for Environmental Assessment, U.S. EPA or no evidence in humans C - Possible human carcinogen D - Not classifiable as a human carcinogen E - Evidence of noncarcinogenicity									
		Summary	of Toxicity As	ssessment					
This table provides carcino both the oral and inhalatio			is relevant to the	contaminants of c	oncern. Toxicity	y data are pro	ovided for		

			TABLE 5						
Scenario Tir	ne frame:	Current/Future	Characterization Sumr	nary - Carci	nogens				
Receptor Po Receptor Ag		Off-Site Resident	· · · · · · · · · · · · · · · · · · ·	<b>.</b>					
Medium Exposure Medium		Exposure Point	Chemical of Concern		Carcinogenic Ris				
				Ingestion	Inhalation	Dermal	Exposure Routes Total		
Groundwat er	Groundwat er	Tap Water	Tetrachloroethene Trichloroethene	5.7e-04 3.0e-05	2.9e-05 4.2e-05	4.2e-05 8.0e-07	6.4e-04 7.5e-05		
						Total Risk =	7.0e-04		
Scenario Tir Receptor Po Receptor Ag	pulation:	Current/Future Off-Site Resident D-6 yrs)							
Medium	Exposure Medium	Exposure Point	Chemical of Concern						
	Medium			Ingestion	Inhalation	Dermal	Exposure Routes Total		
Groundwat er	Groundwat er	Tap Water	Tetrachloroethene Trichloroethene	3.3e-04 1.7e-05	6.3e-05 9.1e-05	3.3e-05 6.1e-07	4.3e-04 1.1e-04		
						Total Risk =	5.0e-04		
	-	a							
Scenario Tin Receptor Po Receptor Ag	pulation:	Current/Future Site Worker			`				
Receptor Po	epulation: e: Adult Exposure		Chemical of Concern		Car	cinogenic Risk			
Receptor Po Receptor Ag	pulation: je: Adult	Site Worker	Chemical of Concern	Ingestion	Car	cinogenic Risk Dermal	Exposure Routes Total		
Receptor Po Receptor Ag Medium	epulation: e: Adult Exposure	Site Worker	Chemical of Concern Tetrachloroethene Trichloroethene	Ingestion 2.1e-04 1.1e-05	[]				
Receptor Po Receptor Ag Medium	epulation: e: Adult Exposure Medium Groundwat	Site Worker	Tetrachloroethene	2.1e-04	Inhalation		<b>Total</b> 2.1e-04		
Receptor Po Receptor Ag	epulation: e: Adult Exposure Medium Groundwat er ne frame: opulation:	Site Worker	Tetrachloroethene	2.1e-04	Inhalation	Dermal - 	Total 2.1e-04 1.1e-05		
Receptor Po Receptor Ag Medium Groundwat er Scenario Tin Receptor Po	pulation: pe: Adult Exposure Medium Groundwat er ne frame: pulation: pulation: pe: Adult Exposure	Site Worker Exposure Point Tap Water Future	Tetrachloroethene	2.1e-04	Inhalation 	Dermal - 	Total 2.1e-04 1.1e-05		
Receptor Po Receptor Ag Medium Groundwat er Scenario Tin Receptor Po Receptor Ag	pulation: pe: Adult Exposure Medium Groundwat er ne frame: pulation: pe: Adult	Site Worker Exposure Point Tap Water Future On-Site Resident	Tetrachloroethene Trichloroethene	2.1e-04	Inhalation 	Dermal - Total Risk =	Total 2.1e-04 1.1e-05		
Receptor Po Receptor Ag Medium Groundwat er Scenario Tin Receptor Po Receptor Ag	pulation: pe: Adult Exposure Medium Groundwat er ne frame: pulation: pulation: pe: Adult Exposure	Site Worker Exposure Point Tap Water Future On-Site Resident	Tetrachloroethene Trichloroethene	2.1e-04 1.1e-05	Inhalation  Card	Dermal - Total Risk = cinogenic Risk	Total 2.1e-04 1.1e-05 2.0e-04 Exposure Routes		

	Exposure	Exposure Point	Chemical of Concern		Caro	cinogenic Risk	
	Medium			ingestion	Inhalation	Dermal	Exposure Routes Total
Groundwat er	Groundwat er	Tap Water	Tetrachloroethene Trichloroethene	3.3e-04 1.7e-05	1.4e-04 3.2e-04	3.3e-05 6.1e-07	4.6e-04 3.4e-04

Key

- Route of exposure is not applicable to this medium or was not quantitatively evaluated.
   The uphalation risk for the future on-Site resident includes both inhalation of vapors while
- \* The inhalation risk for the future on-Site resident includes both inhalation of vapors while showering and from subsurface vapor intrusion.

#### Summary of Risk Characterization - Carcinogens

The table presents risk estimates for the significant routes of exposure. These risk estimates are based on a reasonable maximum exposure and were developed by taking into account various conservative assumptions about the frequency and duration of the receptors exposure to soil and groundwater, as well as the toxicity of the COCs.

			-	TABLE	6				
,			Risk Character	ization Summ	ary - Non-C	arcinogens		<u></u>	
	Time frame: Population: Age:		nt/Future e Resident		、 				
Medium	Exposur	Exposur	Chemical of	Primary	Non-Carcinogenic Hazard Quotient				
	e Medium	e Point	Concern	Target Organ	Ingestion	Inhalation	Dermal	Exposure Route Total	
Ground-	Ground-	Tap Water	Tetrachloroethene	Liver/Kidney	3.1e-01	2.4e-02	2.3e-02	3.5e-01	
water	water	vvater	Trichloroethene	Liver/Kidney/ Fetus/CNS	7.2e-01	2.7e-02	1.9e-02	7.6e-01	
						Total Receptor I	Hazard Index =	1.0e+00	
	Time frame: Population: Age:	Off-Sit	nt/Future e Resident 0-6 yrs)						
Medium	Exposur	Exposur	Chemical of	Primary		Non-Carcinog	enic Hazard Quo	otient	
	e Medium	e Point	Concern	Target Organ	Ingestion	Inhalation	Dermal	Exposure Route Total	
Ground-	Ground-	Тар	Tetrachloroethene	Liver/Kidney	7.2e-01	2.1e-01	7.0e-02	9.9e-01	
water	water	Water	Trichloroethene	Liver/Kidney/ Fetus/CNS	1.7 <b>e+</b> 00	2.3e-01	6.0 <b>e</b> -02	2.0e+00	
						Total Receptor H	lazard index =	3.0e+00	
				·		ו	otal Liver HI =	3.0e+00	
						Т	otal Fetus HI =	2.0e+00	
						To	tal Kidney Hi =	3.0e+00	
						•	Total CNS HI =	2.0e+00	
	lime frame: Population: Age:	Future On-Sit Adult	e Resident						
Medium	Exposur	Exposure	Chemical of	Primary		Non-Carcinoge	enic Hazard Quo	otient	
	e Medium	Point	Concern	Target Organ	Ingestion	Inhalation*	Dermal	Exposure Route Total	
Ground-	Ground-	Tap Water	Tetrachloroethene	Liver/Kidney	3.1e-01	6.8e-02	2.3e-02	4.0e-01	
water	water		Trichloroethene	Liver/Kidney/ Fetus/CNS	7.2e-01	2.4e-01	1.9e-02	9.7e-01	
						Total Receptor H	lazard Index =	1.0 <del>e</del> +00	
						. T	otal Liver HI =	1.0e+00	
						Te	otal Fetus Hi =	1.0e+00	
						Tot	al Kidney HI =	1.0e+00	
						r	Total CNS HI =	1.0e+00	

•

	Fime frame: Population: Age:	Future On-Site Child (0	e Resident )-6 yrs)					
Medium Exposur		Exposure	Chemical of	Primary		Non-Carcinog	enic Hazard Qu	otient
	e Medium	Point	Concern	Target Organ	Ingestion	Inhalation*	Dermal	Exposure Routes Total
Ground-	Ground-	Tap Water	Tetrachloroethene	Liver/Kidney	7.2e-01	3.3e-01	7.0e-02	1.1e+00
water	water		Trichloroethene	Liver/Kidney/ Fetus/CNS	1.7e+00	8.2e-01	6.0e-02	2.6e+00
	<u>.</u>					Total Receptor H	lazard Index =	4.0e+00
						ד	otal Liver HI =	4.0e+00
						Т	otal Fetus HI =	3.0e+00
						To	tal Kidney HI =	4.0e+00
							Total CNS HI =	3.0e+00

Key

CNS: Central Nervous System

The inhalation hazard for the future on-Site resident includes both inhalation of vapors while showering and from subsurface vapor intrusion.

#### Summary of Risk Characterization - Non-Carcinogens

The table presents hazard quotients (HQs) for each route of exposure and the hazard index (sum of hazard quotients) for all routes of exposure. The Risk Assessment Guidance for Superfund states that, generally, a hazard index (HI) greater than 1 indicates the potential for adverse non-cancer effects.

63

# Table 2-1Potential Chemical-Specific ARARsIceland Coin Laundry SiteVineland, New Jersey

Act/Authority	Criteria/Issues	Citation	Status	Brief Description	FS Consideration
Federal Safe Drinking Water Act	National Primary Drinking Water Standards- Maximum Contaminant Levels (MCLs) and Maximum Contaminant Level Goals (MCLGs)	40 CFR 141	Relevant and Appropriate	Establishes health- and technology-based standards for public drinking water systems. Also establishes drinking water quality goals set at levels at which no adverse health effects are anticipated, with an adequate margin of safety.	The MCLs will be considered in developing preliminary remediation goals.
State of New Jersey Statutes and Rules	Drinking Water Standards- Maximum Contaminant Levels (MCLs)	N.J.A.C. 7:10 Safe Drinking Water Act	Relevant and Appropriate	Establishes MCLs that are generally equal to or more stringent then Safe Drinking Water Act (SDWA) MCLs.	The MCLs will be considered in developing preliminary remediation goals.
State of New Jersey Statutes and Rules	Groundwater Quality Standards	N.J.A.C. 7:9C Groundwater Quality Standards	Applicable	Establishes standards for the protection of groundwater quality. Used as the primary basis for setting numerical criteria for groundwater cleanups.	The promulgated values are compared to the maximum levels to determine the magnitude of contamination.

#### Table 2-2 Potential Location-Specific ARARs Iceland Coin Laundry Site Vineland, New Jersey

Act/Authority	Criteria/Issues	Citation	Status	Brief Description	FS Consideration
Federal	Statement on Procedures on Floodplain Management and Wetlands protection	40 CFR 6 Appendix A	Applicable	This Statement of Procedures sets forth Agency policy and guidance for carrying out the provisions of Executive Orders 11988 and 11990.	Alternatives will take into consideration floodplain management and wetland protection.
Federal	Policy on Floodplains and Wetland Assessments for CERCLA Actions	OSWER Directive 9280.0-12, 1985	To be considered	Superfund actions must meet the substantive requirements of E.O. 11988, E.O. 11990, and 40 CFR part 6, Appendix A.	Alternatives will take into consideration floodplain management and wetland protection.
Federal (Non- Regulatory)	Floodplains Executive Order	Executive Order 11988	To be considered	Federal agencies are required to reduce the risk of flood loss, to minimize impact of floods, and to restore and preserve the natural and beneficial values of floodplains.	The potential effects of any action will be evaluated to ensure that the planning and decision making reflect consideration of flood hazards and floodplains management, including restoration and preservation of natural undeveloped floodplains.

Act/Authority	Criteria/Issues	Citation	Status	Brief Description	FS Consideration
Federal (Non- Regulatory)	Wetlands Executive Order	Executive Order 11990	To be considered	Federal agencies are required to minimize the destruction, loss, or degradation of wetlands and to preserve and enhance natural and beneficial values of wetlands.	Remedial alternatives that involve construction must include all practicable means of minimizing harm to wetlands. Wetlands protection considerations must be incorporated into the planning and decision making of remedial alternatives.
Federal Endangered Species Act	Protection of threatened and endangered species	16 USC 1531 et seq. 40 CFR 400	Applicable	Statute regarding the special preservation and protection of threatened and endangered species of fish and wildlife.	The potential effects of any action will be evaluated to ensure that any endangered or threatened species would not be affected.
Federal Fish and Wildlife Conservation Act	Statement of Procedures for non- game fish and wildlife protection	16 usc 2901 et seq.	Applicable	Establishes EPA policy and guidance for promoting the conservation of non-game fish and wildlife and their habitats. Action must protect fish or wildlife.	Applicable for construction activities with may potentially impact non-game fish or wildlife and their habitats.
Federal National Historic Preservation Act	Procedures for preservation of historical and archeological data	16 USC 469 et. Seq.; 40 CFR 6301(c)	Applicable	Establishes procedures to provide for preservation of historical and archeological data that might be destroyed through alteration of terrain as a result of a federal construction project or a federally licensed activity or program.	Cultural resources survey would be performed to assess if historical or archeological data could potentially be encountered during remediation.

CDM

57

Iceland Final FS

Page 2 of 3

Act/Authority	Criteria/Issues	Citation	Status	Brief Description	FS Consideration
New Jersey Freshwater Wetland Protection Act	Freshwater Wetland Protection Act rules	N.J.A.C.7:7A	Applicable	Establish requirements for the protection of treshwater wetlands. Requires permits for construction within wetland areas.	Applicable for construction activities performed in the vicinity- of a wetland or waterway.
New Jersey Hazard Area Control Act	Floodplain Use and Limitations	N.J.A.C. 7:13	Applicable	State standards for activities within floodplains	Applicable for construction activities performed in the vicinity of a wetland or waterway.
New Jersey Endangered and Non- game Species Conservation Act	Protection of threatened and endangered species	N.J.S.A. 23:2A- 1 to 13	Applicable	Standard for the protection of endangered, non-game and exotic wildlife	The potential effects of any action will be evaluated to ensure that any endangered or threatened species would not be affected.

11

Act/Authority	Criteria/Issues	Citation	Status	Brief Description	FS Consideration
General Remediatio	'n				
Federal Occupational Safety and Health Act	Worker Protection	29.CFR 1904	Applicable	Establishes requirements for recording and reporting occupational injuries and illnesses.	Under 40 CFR 300.38, requirements of OSHA apply to all activcities which fall under jurisdiction of the National Contingency Plan.
Federal Occupational Safety and Health Act	Worker Protection	29 CFR 1910	Applicabie	Specifies minimum requirements to maintain worker health and safety during hazardous waste operations. Includes training requirements and construction safety requirements.	Under 40 CFR 300.38, requirements of OSHA apply to all activities which fall under jurisdiction of the National Contingency Plan.
Federal Occupational Safety and Health Act	Worker Protection	29 CFR 1926	Applicable	Specifies safety and health regulations for construction.	Under 40 CFR 300.38, requirements of OSHA apply to all activities which fall under jurisdiction of the National Contingency Plan.
Federal Resource Conservation and Recovery Act	Identification and listing of hazardous wastes	40 CFR 261	Applicable	Describes methods for identifying hazardous wastes and lists known hazardous wastes	applicable to the identification of hazardous wastes that are generated, treated, stored, or disposed during remedial activities.
Federal Resource Conservation and Recovery Act	Standards for owners/operators of permitted hazardous waste facilities	40 CFR 264.10 - 164.18	Relevant and Appropriate	Lists general facility requirements including general waste analysis, security measures, inspections, and training requirements	Treatment facility will be designed, constructed, and operated in accordance with this requirement. All workers will be properly trained.

7

Act/Authority	Criteria/Issues	Citation	Status	Brief Description	FS Consideration
General Remediation	n (Continued)				
New Jersey Statutes and Rules	Technical Requirements for Site Remediation	N.J.A.C. 7:26E	Applicable	Establishes minimum regulatory requirements for investigation and remediation of contaminated sites in New Jersey.	Operation of the treatment facility must comply with the regulation.
New Jersey Noise Control Act of 1971	Noise Control	N.J.A.C. 7:29	Applicable	Limits the noise generated from any industrial, commercial, public service or community service facility.	Limits the noise that can be generated during remedial activities.
New Jersey Unitorm Construction Code	New Construction and Renovations	N.J.A.C. 5:23	Applicable	Establishes standards for all new construction and renovation.	This may be an ARAR to the extent that new construction fall within the standards.
New Jersey Soil Erosion and Sediment Control	Soil Erosion and Sediment Control Standards	N.J.A.C. 16:25A	Applicable	Requires erosion mitigation during construction activities.	Requires erosion control consideration during construction activities.

.

Act/Authority	Criteria/Issues	Citation	Status	Brief Description	FS Consideration
Discharge of Groun	dwater or Wastewate	er	**************************************		
Federal Clean Water Act	National Pollution Discharge Elimination System (NPDES)	40 CFR 100, 122 and 125	Relevant and Appropriate	Issues permits for discharge into navigable waters. Establishes criteria and standards for imposing treatment requirements on permits.	Disposal of treated groundwater to the surface water. NPDES permit may not be required since New Jersey has an approved State Pollutant Discharge Elimination System (SPDES) permit program, the New Jersey State Pollutant Discharge Elimination System (NJPDES).
Federal Clean Water Act	Effluent Guidelines and Standards for the Point Source Category	40 CFR 414	Relevant and Appropriate	Requires specific effluent characteristics for discharge under NPDES permits.	Disposal of treated groundwater to the surface water. NPDES permit may not be required since New Jersey has an approved SPDES permit program (NJPDES).
Federal Clean Water Act	Ambient Water Quality Criteria	40 CFR 131.36	Relevant and Appropriate	Establishes criteria for surface water quality based on toxicity to aquatic organisms and human health.	Disposal of treated groundwater to the surface water. Federally approved New Jersey groundwater and surface water standards take precedence over the Federal criteria.
Federal Safe Drinking Water Act	Underground Injection Control Program	40 CFR 144 and 146	Relevant and Appropriate	Establishes performance standards, well requirements, and permitting requirements for groundwater reinjection wells.	Must comply with requirements for injection of treated groundwater.
New Jersey Statutes and Rules	The New Jersey Pollutant Discharge Elimination System	N.J.A.C. 7:14A	Applicable	Establishes standards for discharge of pollutants to surface water and groundwater.	New Jersey has a state approved program. Disposal of treated groundwater to surface water will require a NJPDES permit.

21

Act/Authority	Criteria/Issues	Citation	Status	Brief Description	FS Consideration
Off-gas Managemei	nt				
Federal Clean Air Act	National Ambient Air Quality Standards	40 CFR 50	Relevant and Appropriate	Provides standards for ambient air quality that are protective of human health.	Need to meet air quality standards when discharging off-gas.
Federal Clean Air Act	Standards of Performance for New Stationary Sources	40 CFR 60	Relevant and Appropriate	Provides emission requirements for new stationary sources.	Need to meet requirements when discharging off-gas.
Federal Clean Air Act	National Emission Standards for Hazardous Air Pollutants	40 CFR 61	Relevant and Appropriate	Provides emission standards for 8 contaminants including benzene and vinyl chloride. Identifies 25 additional contaminants as having serious health effects, but does not provide emission standards for these contaminants.	Need to meet requirements when discharging off-gas.
Federal Directive	Control of Air Emissions from Superfund Air Strippers	OSWER Directive 9355.0- 28	Relevant and Appropriate	Provides guidance on the use and controls for Superfund site air strippers as well as other vapor extraction techniques in attainment and non-attainment areas for ozone.	Applicable to remediation alternatives which involve air stripping and vapor extraction process.
New Jersey Air Pollution Control Act	Air Permits and Certificates	N.J.A.C. 7:27-22	Applicable	Describes requirements and procedures for obtaining air permits and certificates.	Applicable to remediation alternatives which involve discharge of vapor.
New Jersey Air Pollution Control Act	Standards for Hazardous Air Pollutants	N.J.A.C. 7:27	Applicable	Rules that govern the emission of and such activities that result in the introduction of contaminants into the ambient atmosphere.	Need to meet requirements when discharging off-gas.

Act/Authority	Criteria/Issues	Citation	Status	Brief Description	FS Consideration
Waste Transportation	on and Disposal		<u> </u>	<b></b>	
Federal Resource Conservation and Recovery Act	Standards applicable to Transporters of Hazardous Waste	40 CFR 263	Applicable	Establishes standards for hazardous waste transporters	Contractor transport hazardous material from the site will comply with this regulation
Department of Transportation Rules	Rules for transportation of hazardous materials	49 CFR 107, 171, 177 to 179	Applicable	Outlines procedures for the packaging, labeling, manifesting, and transporting hazardous materials	Contractor transport hazardous material from the site will comply with this regulation
New Jersey Department of Transportation	Transportation of hazardous materials	N.J.A.C. 16:49	Applicable	Regulates shipping and transportation of hazardous material	Contractor transport hazardous material from the site will comply with the requirements

<u>i</u>

## **APPENDIX III**

## **ADMINISTRATIVE RECORD INDEX**

#### ICELAND COIN LAUNDRY SITE ADMINISTRATIVE RECORD FILE INDEX OF DOCUMENTS

#### 3.0 REMEDIAL INVESTIGATION

#### 3.2 Sampling and Analysis Data/Chain of Custody Forms

- P.300001-<br/>300182Report: Technical Memorandum, Iceland Coin Laundry Site, Remedial<br/>Investigation/Feasibility Study, Vineland. Cumberland County, New<br/>Jersey, prepared by CDM Federal Programs Corporation, prepared for<br/>U.S. Environmental Protection Agency, October 4, 2002.
- P. 300183 -300705
   Report: Data Summary Technical Memorandum, Iceland Coin Laundry Superfund Site, Remedial Investigation/Feasibility Study, Vineland. Cumberland County, New Jersey, prepared by CDM Federal Programs Corporation, prepared for U.S. Environmental Protection Agency, April 15, 2004. (Attachment: Letter to Mr. Matthew Westgate, Remedial Project Manager, U.S. Environmental Protection Agency, from Ms. Jeanne Litwin, REM, CDM Federal Programs Corporation, April 15, 2004.)

#### 3.3 Work Plans

Ρ.	300706 - 300835	Report: <u>Final Work Plan, Volume I, Iceland Coin Laundry Site, Remedial</u> <u>Investigation/Feasibility Study, Cumberland County, New Jersey,</u> prepared by CDM Federal Programs Corporation, prepared for U.S. Environmental Protection Agency, April 9, 2001.
P.	300836 - 300888	Report: <u>Draft Health and Safety Plan (HASP) Iceland Coin Laundry Site,</u> <u>Remedial Investigation/Feasibility Study, Cumberland County, New</u> <u>Jersey</u> , prepared by CDM Federal Programs Corporation, prepared for U.S. Environmental Protection Agency, May 1, 2001.
P.	300889 - 301027	Report: <u>Revised Final Work Plan, Volume I, Iceland Coin Laundry Site,</u> <u>Remedial Investigation/Feasibility Study, Cumberland County, New</u> <u>Jersey</u> , prepared by CDM Federal Programs Corporation, prepared for U.S. Environmental Protection Agency, January 14, 2002
P.	301028 - 301482	Report: <u>Final Quality Assurance Project Plan, Iceland Coin Laundry Site,</u> <u>Remedial Investigation/Feasibility Study, Vineland, New Jersey</u> , prepared by CDM Federal Programs Corporation, prepared for U.S. Environmental Protection Agency, April 15, 2002.

P.301483 -<br/>301557Report: Draft Quality Assurance Project Plan Addendum, Iceland Coin<br/>Laundry Site, Remedial Investigation/Feasibility Study, Vineland, New<br/>Jersey, prepared by CDM Federal Programs Corporation, prepared for<br/>U.S. Environmental Protection Agency, December 6, 2002.

#### **3.4 Remedial Investigation Reports**

- P. 301558 -301624
   Report: <u>Iceland Coin Laundry Superfund. Site, City of Vineland,</u> <u>Cumberland County, New Jersey, Stage 1A Cultural Resources Survey,</u> prepared by Mr. Patrick J. Heaton, RPA, Joel I. Klein, Ph. D., RPA, Mr. Douglas C. McVarish, John Milner Associates, Inc., prepared for CDM Federal Programs Corporation and the United States Environmental Protection Agency (Region II), August 2002.
- P.301625 -<br/>301743Report: Pathway Analysis Report, Iceland Coin Laundry Superfund Site,<br/>Remedial Investigation/Feasibility Study, Vineland, New Jersey, prepared<br/>by CDM Federal Programs Corporation, prepared for U.S. Environmental<br/>Protection Agency, April 30, 2004.
- P.301744 -<br/>302486Report: Final Remedial Investigation Report Iceland Coin Laundry Site,<br/>Remedial Investigation/Feasibility Study, Vineland, Cumberland County,<br/>New Jersey, prepared by CDM Federal Programs Corporation, prepared<br/>for U.S. Environmental Protection Agency, February 1, 2006

#### 4.0 FEASIBILITY STUDY

#### 4.3 Feasibility Study Reports

- P. 400001 -400054 Report: <u>Draft Feasibility Study Technical Memorandum: Screening of</u> <u>Remedial Technologies, Iceland Coin Laundry Site, Remedial</u> <u>Investigation/Feasibility Study, Vineland, Cumberland County. New</u> <u>Jersey</u>, prepared by CDM Federal Programs Corporation, prepared for U.S. Environmental Protection Agency, December 16, 2005.
- P.400055 -<br/>400225Report: Final Feasibility Study Report, Iceland Coin Laundry Site,<br/>Remedial Investigation/Feasibility Study, Vineland. Cumberland County,<br/>New Jersey, prepared by CDM Federal Programs Corporation, prepared<br/>for U.S. Environmental Protection Agency, July 14, 2006.

#### 8.0 HEALTH ASSESSMENTS

#### 8.1 ATSDR Health Assessments

- P.800001 -<br/>800255Report: Final Baseline Human Health Risk Assessment, Iceland Coin<br/>Laundry Superfund Site. Remedial Investigation/Feasibility Study,<br/>Vineland, New Jersey, prepared by CDM Federal Programs Corporation,<br/>prepared for U.S. Environmental Protection Agency, January 27, 2006
- P. 800256 Report: Public Health Assessment for Iceland Coin Laundry Site (a/k/a 800295 Iceland Coin Laundry Area Groundwater Plume), Vineland, Cumberland County, New Jersey, prepared by U.S. Department of Health and Human Services, Public Health Service, Agency for Toxic Substances and Disease Registry, December 20, 2001.

#### **10.0 PUBLIC PARTICIPATION**

#### **10.9 Proposed Plan**

P. 10.00001- Superfund Program Proposed Plan, Iceland Coin Laundry Superfund Site, 10.00011 Vineland, New Jersey, prepared by U.S. EPA, Region 2, July 2006.

## **APPENDIX IV**

## NJDEP CONCURRENCE LETTER



State of New Jersey Department of Environmental Protection

LISA P. JACKSON Commissioner

Mr. George Pavlou, Director Emergency and Remedial Response Division U.S. Environmental Protection Agency Region II 290 Broadway New York, NY 10007-1866

SEP 2 7 2006

Rc: Iccland Coin Laundry Superfund Site Record of Decision

Dcar Mr. Pavlou:

The New Jersey Department of Environmental Protection (NJDEP) has reviewed the "Record of Decision, Iceland Coin Laundry Superfund Site, 1888 South Delsea Drive, Vineland, Cumberland County, New Jersey" prepared by the U.S. Environmental Protection Agency (USEPA) Region II in September 2006 and concurs with its selected remedy to address groundwater contaminated with tetrachloroethene and associated breakdown products at the site. The selected remedy for the site is in-situ treatment of the contaminant plume.

The major components of the selected remedy include:

- In-situ biological treatment (enhanced anaerobic bioremediation) for cleanup of the groundwater at the Iceland Coin Laundry Site and, if necessary, for soils at the facility area;
- Institutional controls which would include a Classification Exception Area and well drilling restrictions;
- Long-term groundwater monitoring; and,
- Connection of any residences or businesses, if determined necessary, to a public water supply that are impacted by the site plume.

JON S. CORZINE Guvernor NJDEP appreciates the opportunity to participate in the decision making process to select an appropriate remedy and is looking forward to future cooperation with USEPA to implement the selected remedy.

If you have any questions, please call Edward Putnam, Assistant Director of the Remedial Response Element, at 609-984-3078.

Sincerely, Thingken

Irene Kropp, Assistant Commissioner Site Remediation and Waste Management Program

C: Edward Putnam, Assistant Director, Remedial Response Element, NJDEP Carole Petersen, Chief, New Jersey Remediation Branch, USEPA

# **APPENDIX V**

# **RESPONSIVENESS SUMMARY**

# **RESPONSIVENESS SUMMARY** Iceland Coin Laundry Superfund Site

# **INTRODUCTION**

This Responsiveness Summary provides a summary of the public's comments and concerns regarding the Proposed Plan for the Iceland Coin and Laundry Site. At the time of the public comment period, EPA proposed a preferred alternative for contaminated groundwater at the Site. All comments summarized in this document have been considered in EPA's final decision for the selection of a remedial alternative for the Site.

This Responsiveness Summary is divided into the following sections:

- I. BACKGROUND ON COMMUNITY INVOLVEMENT AND CONCERNS: This section provides the history of community involvement and interests regarding the Site.
- II. COMPREHENSIVE SUMMARY OF MAJOR QUESTIONS, COMMENTS, CONCERNS, AND RESPONSES: This section contains summaries of oral comments received by EPA at the public meeting, EPA's responses to these comments. No written comments were received during the public comment period.
- III. ATTACHMENTS: The last section of this Responsiveness Summary provides attachments which document public participation in the remedy-selection process for-this Site. They are as follows:

**Attachment A**: the Proposed Plan that was distributed to the public for review and comment;

Attachment B: the public notice that appeared in the Vineland Daily Journal, and

Attachment C: the transcript of the public meeting.

# I. BACKGROUND ON COMMUNITY INVOLVEMENT AND CONCERNS

The ROD outlined the remedy to address PCE and TCE groundwater contamination extending approximately 4,700 feet to the southwest of the facility. There were approximately 65 residences in this area that were sampled in 1990 and 1991. In late 1991, Point-of-Entry treatment systems were installed in 16 of the residences until the City of Vineland extended the water main to the area in July 1994. Ninety-one homes were connected by early 1996. After that, community concerns shifted from the safety of their drinking water to interest in the extent of contamination and the long-term cleanup.

On August 5, 2006, EPA released the Proposed Plan and supporting documentation for the groundwater remedy to the public for comment. EPA made documents available to the public in the Administrative Repositories maintained at the EPA Records Center, 18th floor, 290 Broadway, New York, N.Y. and the City of Vineland Health Department, 640 East Wood Street, City of Vineland, New Jersey. EPA published a notice of availability for the documents in the Vineland's *The Daily Journal* and opened a public comment period from August 5, 2006 to September 5, 2006. On August 10ch, EPA and a representative from NJDEP conducted a public meeting in the Council Chambers room of the Vineland City Hall to inform local officials and interested citizens about the Superfund process, to review the planned remedial activities at the Site, and to respond to any questions from residents and other attendees. No comments were received during the public meeting or the 30-day public comment period.

# II. <u>COMPREHENSIVE SUMMARY OF MAJOR QUESTIONS, COMMENTS,</u> <u>CONCERNS, AND RESPONSES</u>

# **PART 1: Verbal Comments**

This section summarizes comments received from the public during the public comment period, and EPA's responses.

On August 5, 2006, EPA released the Proposed Plan and supporting documentation for the groundwater remedy to the public for comment. On August 10, 2006, EPA and a representative from NJDEP conducted a public meeting in the Council Chambers room of the Vineland City Hall to inform local officials and interested citizens about the Superfund process, to review the planned remedial activities at the Site, and to respond to any questions from residents and other attendees. No comments were received during the public meeting or the 30-day public comment period.

No written comments were received during the comment period.

# **PART 2: Written Comments**

Comments and concerns that were not addressed at the public meeting were accepted in writing during the public comment period. No written comments were received during the comment period.

# ATTACHMENT A

# PROPOSED PLAN

Superfund Program Proposed Plan

# U.S. Environmental Protection Agency, Region II

Iceland Coin Laundry Superfund Site Vineland, New Jersey

# EPA ANNOUNCES PROPOSED PLAN

This Proposed Plan describes the remedial alternatives that the U.S. Environmental Protection Agency (EPA) considered to remediate the contaminated groundwater plume at the Iceland Coin Laundry Superfund Site (the Site) located in Vineland, N.J. and identifies EPA's preferred remedy with the rationale for this preference. The Preferred Alternative calls for applying in-situ bioremediation technology within the plume to restore the groundwater to levels that meet Federal and State standards. This document is issued by EPA, the lead agency for Site activities, and the New Jersey Department of Environmental Protection (NJDEP), the support agency for this project. EPA, in consultation with NJDEP, will select a final remedy for the Site after reviewing and considering all information submitted during the 30day public comment period. EPA, in consultation with NJDEP, may modify the Preferred Alternative or select another response action presented in this Plan based on new information or public comments. Therefore, the public is encouraged to review and comment on all the alternatives presented in this Proposed Plan. EPA is issuing this Proposed Plan as part of its public participation responsibilities under Section 117(a) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, as amended, and Sections 300.430(f) and 300.435(c) of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). The nature and extent of the contamination at the Site and the alternatives summarized in this Proposed Plan are described in the February 2006 Remedial Investigation (RI) Report and the July 2006 Feasibility Study (FS) Report, respectively.

## SITE BACKGROUND

#### Site Description

The Site is located at the former Iceland Coin Laundry and Dry Cleaning facility, at 1888 South Delsea Drive, in the City of Vineland, Cumberland County, New Jersey. (See Figure 1). The study area, which covers approximately 15 acres, consists of the former Iceland Coin Laundry and Dry Cleaning facility and the associated contaminated groundwater plume to the south/southwest of the former facility. To the west of the Site is a mobile

## MARK YOUR CALENDAR

August 5, 2006 - September 5, 2006: Public comment period on the Proposed Plan. EPA will accept written comments on the Proposed Plan during the public comment period. Written comments on this Proposed Plan should be addressed to:

> Matthew Westgate Remedial Project Manager U.S. Environmental Protection Agency 290 Broadway, 19th Floor New York, New York 10007-1866

Phone: (212) 637-4422 Internet: <u>westgate.matthew@epa.gov</u>

#### August 10, 2006 at 7:00 P.M.:

EPA will hold a public meeting to explain the Proposed Plan and all of the alternatives presented in the Feasibility Study (FS). Oral and written comments will also be accepted at the meeting. The public meeting will be held at:

> Vineland City Hall <sup>7th</sup> and Wood Streets, Council Chambers Conference Room Vineland, New Jersey

The administrative record file, which contains the information upon which the selection of the response action will be based, is available at the following locations:

#### Vineland City Health Department

640 East Wood Street Vineland, NJ 08362 (856) 794-4000 *Hours:* Mon - Fri 9 AM - 5 PM

USEPA-Region II

Superfund Records Center 290 Broadway, 18th Floor New York, NY 10007-1866 (212) 637-4308 Hours: Monday-Friday, 9:00 AM - 5:00 PM home park; to the south is a home; adjacent to the north is a used auto lot; and to the east is vacant property once used as an automotive repair shop, and a New Jersey Department of Transportation (NJDOT) facility.

# Site History

The former leeland Coin Laundry and Dry Cleaning facility operated from approximately 1953 until at least 1971. Limited information is available regarding waste disposal areas and systems. Four coin-operated dry cleaning units of eight-pound capacity were present in the laundromat, each using four gallons of tetrachloroethene (PCE). It is not known how often the PCE was retilled. No waste/sludge was reportedly generated, since the PCE evaporated. The lint filters from the dry cleaning units were allegedly burned outside in the back of the building.

Two 14-foot deep seepage pits/cesspools with a 40foot drain field between the pits were used beginning in 1962. According to the former owner, the cesspools were located in the front of the building. Septic system design drawings from 1963 indicate effluent from 10 washers discharged to a septic tank, continued through a 100-foot field drain, and terminated at a 4-foot diameter receptor vessel. The property was connected to the sanitary sewer in 1986.

On September 3, 1987, the City of Vineland Health Department collected a potable well sample from 1276 Garrison Road, in which TCE (trichloroethane) was detected. A second sample was collected in August 1990, in which both TCE and PCE were detected. A third sample in October 1990 confirmed the presence of TCE and PCE. The levels in this well exceeded both the State and Federal maximum contaminant levels (MCLs). Based on the analytical results, the homeowner was advised to discontinue using the well water for cooking and drinking purposes.

From December 1990 to September 1991, the Vineland Health Department collected potable well samples from 55 residences located in the area of Garrison Road and West Korff Drive. Analytical results from these sampling activities revealed levels of VOCs (volatile organic compounds) and mercury above Federal and State MCLs in 21 of the 55 water well samples. The primary contaminants were PCE. TCE. 1.2-dichloroethene (1,2-DCE), and mercury. The well with the detected concentration of mercury was subsequently resampled and mercury was not detected.

In November 1991, as a result of the private well contamination, NJDEP installed point-of-entry treatment (POET) units at the affected residences as a temporary remedial measure. In July 1994, the Vineland City Water Department extended public water hook-ups to the affected residences. In December 2003, four residential wells were still in use: three were used for irrigation only and one was still used for drinking water. The owner refused to be connected to public water and had a Point of Entry Treatment system installed.

The Site was placed on the National Priorities List (NPL) in October 1999. EPA is the lead agency for the Site and has primary responsibility for conducting remedial actions.

## Site Geology/Hydrogeology

The Site is located in the southern part of the New Jersey Coastal Plain and is drained by tributaries of the Maurice River. The Coastal Plain may be characterized as a sequence of unconsolidated sands, silts, and clays that dip and thicken to the southeast. The project area is underlain by the Cohansey Sand, with the overlying Bridgeton Formation present locally. These units, as well as the overlying soils, are typically sandy, highly permeable, and low in organic matter and calcium carbonates. Slopes in the area are low, with surface elevations between 60 and 100 feet above mean seal level (amsl). The Site is relatively flat; the elevation is just under 70 feet amsl at the former Iceland Coin Laundry and Dry Cleaning facility and rises to just above 100 feet amsl south of the residential wells that were sampled in the early 1990s.

The principal aquifers of the New Jersey Coastal Plain are the Kirkwood-Cohansey aquifer system, the Atlantic City 800-foot sand of the Kirkwood Formation, the Wenonah-Mount Laurel aquifer, the Englishtown aquifer system, and the Potomac-Raritan-Magothy aquifer system. There are also many minor water-bearing zones locally

# RESULTS OF THE REMEDIAL INVESTIGATION

EPA performed a remedial investigation, which included a source area investigation and a groundwater investigation. Both investigations were designed as a phased approach, using both screening-level and definitive-level data to efficiently locate areas of potential contamination. Each phase was designed to refine locations for subsequent phases of the investigation from potential on-site sources in Site soils. The source area investigation focused on the former Iceland Coin Laundry property, and included a surface geophysical survey to locate the septic tanks. cesspools, drainfields, and any other on-site source areas; subsurface soil screening and characterization: and surface and subsurface soil sampling. The groundwater plume focused on the area downgradient (southwest of) the former facility, and included groundwater characterization and screening, monitoring well installation and sampling, and residential well sampling. The

objective of the groundwater investigation was to characterize the vertical and horizontal extent of contamination at and downgradient of the Site.

Only minor detections of contaminants were found in the soil samples. PCE was detected in subsurface soils at 34 micrograms per kilogram, at a depth of 1-3 feet below ground surface (bgs) in one soil boring located near the former burn pit area. PCE was detected in five surface soil samples (SS-01, SS-06, SS-08, SS-07, and SS-09), at levels below screening criteria. Polycylclic aromatic hydrocarbons (PAHs) were detected in three surface soil samples (SS-01, SS-02, and SS-10), with some levels above screening criteria.

The results of the source area investigation indicate that contaminant sources likely do not remain within the unsaturated soil zone, and that only residual levels of contamination remain in on-site soils.

EPA installed a total of 27 shallow, intermediate, and deep monitoring wells in areas upgradient, on, and downgradient of the former facility, to obtain data to characterize the nature and extent of the groundwater contaminant plume. Two rounds of monitoring well samples were collected. TCE and PCE were detected in five well clusters, situated along the axis of the plume (MW-2, MW-3, MW-4, MW-7, and MW-11 in attached figure), with some levels exceeding EPA and NJDEP's regulatory standards . PCE was detected at a maximum level of 260 parts per billion (ppb) in round 1 and 290 ppb in round 2. TCE was detected at 13 ppb and 17 ppb, respectively. Within these well clusters, exceedances were detected in shallow wells closer to the source area and in intermediate wells further downgradient. No exceedances were detected in wells completed in the deep zone of the aquifer. The VOC plume currently extends over 4,000 feet south/southwest from the Site, and is approximately 900 feet in width.

EPA collected two rounds of water samples from two residential wells. PCE was detected in one of these residential wells located on South Orchard Road, near the northern boundary of the plume at a level of 4.9 ppb. The well was converted to irrigation use only during the RI/FS.

Overall, the subsurface distribution of PCE and TCE indicates that the core of the plume has migrated vertically downward and horizontally to the south/southwest, and that residual contamination remains localized in and around the former facility. The farthest downgradient location in which PCE was detected was MW-11, located approximately 4,700 feet downgradient of the Facility, at a concentration of 14 micrograms per liter ( $\mu$ g/L).

Figure 2 shows the PCE plume. The contours delineate the plume areas in which PCE levels exceed 1 ug/L, 10 ug/L, and 100 ug/L.

## SCOPE AND ROLE OF ACTION

This Proposed Plan constitutes the final response action for the Site. The primary objectives of this action are to reduce and minimize further downgradient migration of contaminants in groundwater, restore groundwater quality in the area of the contaminant plume, and remove any residual contamination adjacent to the Facility, if found.

The proposed remedy will use in-situ bioremediation technology within the groundwater contamination plume and potentially at the localized contamination area adjacent to the Facility. The planned action is necessary to minimize any potential future health and environmental impacts.

## SUMMARY OF SITE RISKS

As part of the RI/FS, a baseline risk assessment was conducted to estimate the current and future effects of contaminants on human health and the environment. The Site is currently an active commercial establishment, with adjacent residential properties, and it is likely that the future land use will remain the same. Additionally, groundwater at the Site is designated by the State as a potable water supply, meaning it could be available for drinking in the future. The baseline human health risk assessment focused on health effects for a variety of possible receptors, including current on-site workers and possible future on-site residents (adults and children) exposed to soils by ingestion of, inhalation of, and dermal contact with contaminants; and current on-site workers, current off-site residents (adults and children), and possible future on-site residents (adults and children) exposed to groundwater through ingestion and inhalation of volatile contaminants. More detail about the exposure pathways and estimates of risk can be found in the Final Human Health Risk Assessment for the Site. It is the lead agency's current judgment that the Preferred Alternative identified in this Proposed Plan is necessary to protect public health or welfare or the environment from actual or threatened releases of hazardous substances from the Site.

## Human Health Risks

EPA's statistical analysis of soil sampling data indicates that all risks and hazards to all populations were within the acceptable levels of risk. For further discussion of risks, please see the text box, "What is risk and how is it calculated?"

EPA's statistical analysis of groundwater sampling data indicates that probable exposure concentrations of PCE and TCE are 112 ug/l and 8 ug/l, respectively. These concentrations are associated with excess lifetime cancer risks and noncancer hazard quotients of 7 x 10-4 and 1.1 for the off-site resident adult. 5 x 10-4 and 3 for the off-site resident child,  $2 \times 10-4$  and 0.4 for the on-site worker, 1 x 10-3 and 1 for the possible future onsite resident adult, and 8 x 10-4 and 3 for the possible future on-site resident child. These concentrations are also in excess of the New Jersey MCL of 1 ug/l for both PCE and TCE.

These risk and hazard levels indicate that there is significant potential risk to populations from direct exposure to groundwater. These risk estimates are based on current reasonable maximum exposure scenarios and were developed by taking into account various conservative assumptions about the frequency and duration of an individual's exposure to the groundwater, as well as the toxicity of PCE and TCE.

A comparison of concentrations of PCE and TCE in groundwater to conservative health-based screening values indicates that there is potential for vapor intrusion into on-site buildings from contaminated groundwater. Therefore, additional investigation of the vapor intrusion pathway at the Site is necessary and will occur during the remedial design phase.

#### Ecological Risk Assessment

EPA conducted an ecological risk assessment at the Site as part of the RI. This assessment concluded that there were no ecological receptors or habitat identified at the Site. As a result, a Screening Level Ecological Risk Assessment (SLERA) was not required.

### REMEDIAL ACTION OBJECTIVES

Remedial Action objectives (RAOs) are specific goals to protect human health and the environment. Section 121(d) of CERCLA, as amended by the Superfund Amendments and Reauthorization Act (SARA) requires that, at a minimum, any remedial action implemented at a site achieve overall protection of human health and the environment and comply with Applicable or Relevant and Appropriate Regulations (ARARs). ARARs at a site may include both Federal and State regulations. Other criteria that do not meet the definition of an ARAR, but may also be considered when developing cleanup alternatives are known as to-be-considered criteria (TBCs). Before developing remedial action (cleanup) alternatives for a Superfund site, EPA establishes both Remedial Action Objectives (RAOs) and Preliminary Remedial Goals (PRGs). RAOs are media-specific goals for protecting human health and the environment. PRGs are chemical-specific cleanup goals, which are used as benchmarks in the screening, development and evaluation of cleanup alternatives. RAOs and PRGs are based on the

ARARs and TBCs that have been identified as applicable to the Site.

The RAOs developed for groundwater at the Iceland Coin Laundry Site are listed below.

- Prevent ingestion of, dermal contact with. and inhalation of chlorinated VOC contaminated groundwater having concentrations in excess of PRGs and,
- Restore the groundwater aquifer system to the PRGs within a reasonable time frame

The PRGs were selected based on federal or state promulgated regulations, including:

- PCE  $1 \,\mu g/L$
- TCE  $1 \mu g/L$ tCE  $1 \mu g/L$ cis-1.2-DCE 70  $\mu g/L$

These PRGs were then used as a benchmark in technology screening, remedial action alternative development, and detailed evaluation of alternatives in the FS report. The retained remedial technologies were assembled into the following remedial action alternatives.

## SUMMARY OF REMEDIAL ALTERNATIVES

CERCLA requires that each selected site remedy be protective of human health and the environment, be cost effective, comply with other statutory laws, and utilize permanent solutions and alternative treatment technologies and resource recovery alternatives to the maximum extent practicable. In addition, the statute includes a preference for the use of treatment as a principal element for the reduction of toxicity, mobility, or volume of the hazardous substances.

The "construction time" for each alternative reflects only the time required to construct or implement the remedy and does not include the time required to design the remedy. It generally takes 1-2 years for planning, design and procurement prior to subsequent construction of the remedial alternative.

Alternative 1 -- No Action

Estimated Capital Cost:	\$0
Estimated Annual O&M Cost:	\$0
Estimated Present Worth:	\$0
Estimated Construction Time:	None

The no action alternative is required by the National Contingency Plan (NCP) to be carried through the screening process, as it serves as a baseline for comparison of the Site remedial action alternatives. Under this alternative, no action would be taken to remediate the contaminated groundwater at the Site. The alternative would not involve any monitoring of groundwater at the Site or institutional controls.

Groundwater would continue to migrate and the contamination would continue to attenuate, mainly through dilution and dispersion processes. This alternative does not reduce the exposure of receptors to Site contaminants. There are no capital or operation and maintenance (O&M) costs associated with this alternative.

Because this alternative would result in hazardous substances, pollutants, or contaminants remaining at the Site above levels that allow for unlimited use and unrestricted exposure of groundwater, EPA would review such action at least every five years.

## Alternative 2 -- Institutional Controls and Longterm Monitoring

Estimated Capital Cost:	\$38,700
Estimated Annual O&M Cost:	\$120,000
Estimated Present Worth:	\$1,770,000
Estimated Construction Time:	None

Under this alternative, no active action would be taken to remediate contaminated groundwater at the Site. Institutional controls such as the designation of a groundwater Classification Exception Area (CEA) would be implemented to eliminate possible exposure of contaminated groundwater to receptors.

Long-term monitoring involving annual groundwater sampling, 5-year review, and periodic Site investigation would be implemented to monitor and evaluate the migration and changes of contaminant concentrations in groundwater.

Because this alternative would result in hazardous substances, pollutants, or contaminants remaining at the Site above levels that allow for unlimited use and unrestricted exposure of groundwater, EPA would review such action at least every five years.

#### <u>Alternative 3 -- In-Situ Physical/Chemical</u> <u>Treatment</u>

Estimated Capital Cost:	\$5,440,000
Estimated Annual O&M Cost:	\$520,000 \$10,690,000
Estimated Present Worth:	
Estimated Construction Time:	2 years

In-situ treatment consists of treating contaminated groundwater in the subsurface.

For this alternative, groundwater circulation well (GCW) technology would be used to treat the contaminant plume within the 10  $\mu$ g/L PCE contour line. GCWs integrate the principles of groundwater re-circulation with air stripping or carbon adsorption of VOCs. The GCW would have a deep and a shallow screen zone. Groundwater would be extracted from the deep screen interval of the well, treated by air stripping or carbon adsorption within the well, and then discharged back to the formation

## WHAT IS RISK AND HOW IS IT CALCULATED?

A Superfund baseline human health risk assessment is an analysis of the potential adverse health effects caused by hazardous substance exposure from a site in the absence of any actions to control or mitigate these under current and future land uses. A four-step process is utilized for assessing site-related human health risks for reasonable maximum exposure scenarios.

Hazard Identification: In this step, the contaminants of concern (COCs) at the site in various media (*i.e.*, soil, groundwater, surface water, and air) are identified based on such factors as toxicity, frequency of occurrence, and fate and transport of the contaminants in the environment, concentrations of the contaminants in specific media, mobility, persistence, and bioaccumulation.

*Exposure Assessment:* In this step, the different exposure pathways through which people might be exposed to the contaminants identified in the previous step are evaluated. Examples of exposure pathways include incidental ingestion of and dermal contact with contaminated soil. Factors relating to the exposure assessment include, but are not limited to, the concentrations that people might be exposed to and the potential frequency and duration of exposure. Using these factors, a "reasonable maximum exposure" scenario, which portrays the highest level of human exposure that could reasonably be expected to occur, is calculated.

Toxicity Assessment: In this step, the types of adverse health effects associated with chemical exposures, and the relationship between magnitude of exposure and severity of adverse effects are determined. Potential health effects are chemical-specific and may include the risk of developing cancer over a lifetime or other non-cancer health effects, such as changes in the normal functions of organs within the body (e.g., changes in the effectiveness of the immune system). Some chemicals are capable of causing both cancer and non-cancer health effects.

Risk Characterization: This step summarizes and combines outputs of the exposure and toxicity assessments to provide a quantitative assessment of site risks. Exposures are evaluated based on the potential risk of developing cancer and the potential for non-cancer health hazards. The likelihood of an individual developing cancer is expressed as a probability. For example, a 10<sup>-4</sup> cancer risk means a "one-in-ten-thousand excess cancer risk"; or one additional cancer may be seen in a population of 10,000 people as a result of exposure to site contaminants under the conditions explained in the Exposure Assessment. Current Superfund guidelines for acceptable exposures are an individual lifetime excess cancer risk in the range of 10-4 to 10-6 (corresponding to a one-in-ten-thousand to a one-in-a-million excess cancer risk) with 10<sup>-6</sup> being the point of departure. For non-cancer health effects, a "hazard index" (HI) is calculated. An HI represents the sum of the individual exposure levels compared to their corresponding reference doses. The key concept for a non-cancer HI is that a "threshold level" (measured as an HI of less than 1) exists below which non-cancer health effects are not expected to occur.

at the shallow screen interval. This technology induces vertical flow within the aquifer, and potentially increases the transport of contaminants from low permeable zones into relatively high permeable zones, subsequently increasing the pumping efficiency in comparison to traditional pump-and-treat systems and reduces the remediation time. Since GCW technology is an innovative technology, a pilot study would be required to determine its effectiveness and to develop the design parameters.

Some minor residual soil contamination at the laundry facility property was identified during the RI. If the pre-design investigation confirms residual contamination adjacent to the Facility that requires treatment, in-situ chemical oxidation would be used for this area.

Because this remedy will not result in hazardous substances, pollutants or contaminants remaining on-site above levels that allow for unlimited use and unrestricted exposure after implementation of the remedy, a statutory five-year review is not required. Although five-year reviews are not required by statute in connection with this alternative, it is EPA's policy to conduct five-year reviews until cleanup goals have been achieved.

<u>Alternative 4 - - In-situ Biological Treatment</u>

Estimated Capital Cost:	\$4,920,000
Estimated Annual O&M Cost:	\$220,000
Estimated Present Worth:	\$7,550,000
Estimated Construction Time:	2 years

This alternative would include applying in-situ bioremediation technology within the I0 µg/L PCE plume area and potentially at the localized contamination area adjacent to the Facility. PCE and TCE could be effectively biodegraded through reductive dechlorination under anaerobic conditions. The RI results indicate that the Site groundwater is under aerobic conditions, which is unsuitable for naturally occurring biodegradation of PCE and TCE. However, amendments such as electron donors and nutrients could be injected into the area and alter the groundwater conditions to promote anaerobic degradation of PCE and TCE to cis-1,2-dichloroethylene (DCE) or methane, ethane and ethene. The breakdown products, cis-1,2-DCE and vinyl chloride (VC), can easily be degraded under existing Site conditions. Generation of VC at concentrations of concern is unlikely. No VC has been detected at the Site during the RI, and cis-1,2-DCE was found at only one location at a concentration higher than the PRG. Bench and pilot-scale study would be required to demonstrate the effectiveness of the technology.

Because this remedy will not result in hazardous substances, pollutants or contaminants remaining on-site above levels that allow for unlimited use and unrestricted exposure after implementation of the remedy, a statutory five-year review is not required. Although five-year reviews are not required by statute in connection with this alternative, it is EPA's policy to conduct five-year reviews until cleanup goals have been achieved.

Alternative 5 -- Pump-and-Treat

Estimated Capital Cost:	\$4,630,000
Estimated Annual O&M Cost:	\$560.000
Estimated Present Worth:	\$13,110.000
Estimated Construction Time:	2 years

Alternative 5 consists of pumping the groundwater from extraction wells to groundwater treatment systems at a rate of 110 gallons per minute, treating the contaminated groundwater through carbon adsorption or other treatment units, then recharging the treated water through surface or subsurface recharge structures. Pumping may be continuous or pulsed to allow equilibration of contaminants with the groundwater.

If the pre-design investigation confirms that localized contamination is present near the Facility and requires treatment, in-situ chemical oxidation would be applied at this area.

Because this remedy will not result in hazardous substances, pollutants or contaminants remaining on-site above levels that allow for unlimited use and unrestricted exposure after implementation of the remedy, a statutory five-year review is not required. Although five-year reviews are not required by statute in connection with this alternative, it is EPA's policy to conduct five-year reviews until cleanup goals have been achieved.

# EVALUATION OF REMEDIAL ALTERNATIVES

In selecting its preferred alternative, EPA uses nine NCP criteria to evaluate the viable remedial alternatives developed for the site. The detailed analysis consists of an assessment of the individual alternatives against each of the nine evaluation criteria and a comparative analysis focusing upon the relative performance of each alternative against those criteria.

CERCLA requires that each selected site remedy be protective of human health and environment, be cost effective, comply with other statutory laws, and utilize permanent solutions and alternative treatment technologies and resource recovery alternatives to the maximum extent practicable. In addition, the statute includes a preference for the use of treatment as a principal element to the reduction of toxicity, mobility, or volume of the hazardous substances.

# COMPARATIVE ANALYSIS

# 1. Overall Protection of Human Health and the Environment

Alternative 1 would not be protective of human health and the environment. Alternative 2 would be protective of human health through institutional controls but would not be protective of the environment. Alternatives 3, 4 and 5 would be equally protective of human health and the environment and would achieve the RAOs. Alternative 4 is expected to achieve RAOs in the shortest time, followed by Alternative 3. Alternative 5 would require the longest time of operations among these three alternatives.

For Alternative 4, the biodegradation process would be closely monitored to ensure complete breakdown of biodegradation byproducts occurs. Accumulation of byproducts is very rare and not anticipated. If the reductive dechlorination stalls, the treatment can be augmented.

#### 2. Compliance with ARARs

Alternatives 1 and 2 would not attain the ARARs in a reasonable time frame. Alternatives 3, 4, and 5 would attain the ARARs within the treatment areas through active treatment, while the contamination outside of the treatment zones would be attenuated by natural mechanisms. All alternatives would comply with location- and action-specific ARARs.

#### 3. Long-term Effectiveness and Permanence

Alternatives 1 and 2 would not have long-term effectiveness and permanence, since contaminants would remain in the subsurface and pose potential risks to human health and the environment. Alternatives 3, 4, and 5 would have long-term effectiveness and permanence through either in-situ or ex-situ treatment. The treatment processes are not reversible.

If pilot testing demonstrates the technologies in Alternatives 3 and 4 are suitable for the Site conditions, these technologies are considered adequate and reliable processes to treat the contamination, since they have been demonstrated successfully at other sites.

# <u>4. Reduction of Toxicity/Mobility/Volume through</u> Treatment

Alternatives 1 and 2 would not reduce the Toxicity/Mobility/Volume (T/M/V), since no active in-situ or ex-situ treatment would be implemented. The total volume of contaminated groundwater would increase as contaminants migrate downgradient. Alternatives 3, 4, and 5 would reduce the T/M/V through physical, chemical or biological processes.

## EVALUATION CRITERIA FOR SUPERFUND REMEDIAL ALTERNATIVES

Overall Protectiveness of Human Health and the Environment determines whether an alternative eliminates, reduces, or controls threats to public health and the environment through institutional controls, engineering controls, or treatment.

**Compliance with ARARs** evaluates whether the alternative meets Federal and State environmental statutes, regulations, and other requirements that pertain to the site, or whether a waiver is justified. **Long-term Effectiveness and Permanence** considers the ability of an alternative to maintain protection of human health and the environment over time. **Reduction of Toxicity, Mobility, or Volume of Contaminants through Treatment** evaluates an alternative's use of treatment to reduce the harmful effects of principal contaminants, their ability to move in the environment, and the amount of contamination present.

**Short-term Effectiveness** considers the length of time needed to implement an alternative and the risks the alternative poses to workers, residents, and the environment during implementation.

*Implementability* considers the technical and administrative feasibility of implementing the alternative, including factors such as the relative availability of goods and services.

**Cost** includes estimated capital and annual operations and maintenance costs, as well as present worth cost. Present worth cost is the total cost of an alternative over time in terms of today's dollar value.

State/Support Agency Acceptance considers whether the State agrees with EPA's analyses and recommendations, as described in the RI/FS and Proposed Plan.

**Community Acceptance** considers whether the local community agrees with EPA's analyses and preferred alternative. Comments received on the Proposed Plan are an important indicator of community acceptance.

## 5. Short-term Effectiveness

For Alternative 1, protection of the community and workers would not be applicable, as no remedial action would occur. For Alternative 2, there would be minimum short-term inconveniences to the residents. For Alternatives 3, 4, and 5, there would be some short-term inconveniences due to the scope of the field operations. However, no major adverse impacts would be expected. Air monitoring, engineering controls, and appropriate worker personal protective equipment (PPE) would be used to protect the community and workers for Alternatives 2 through 5.

For Alternatives 3 and 4, tree removal would be required to access well locations. Consent from property owners would be obtained prior any field work.

EPA Region II - July

The timeframe to accomplish the active remediation for Alternative 4 is anticipated to be shorter than for Alternative 3 based on experience at other sites. Alternative 5 would be operated for a long time due to relatively slow groundwater velocity at the Site. In the absence of groundwater modeling, it would be difficult to configure the optimal layout of groundwater extraction wells within the treatment area and predict the operational timeframe.

For Alternative 4, in-situ bioremediation, the selected amendment would be injected into the subsurface and exist in the groundwater for more than 6 years. Although this amendment is food grade, it may still not be desirable to use this groundwater as drinking water. Currently, only one residence is using groundwater as drinking water. This house is located outside of the treatment area and the PCE level is below the federal drinking water standard.

#### 6. Implementability

## Technical Feasibility

Alternative 1 would be easiest to implement since no action would be taken. Alternative 2 would be the second easiest to implement. Alternatives 3 and 4 would require a pilot study since both involve innovative technologies. Both Alternatives 3 and 5 are technically more difficult to implement than the other alternatives. Optimum groundwater extraction rates would need to be determined during design and a higher volume of groundwater pumping may be required to attain goals.

Groundwater treatment, operation and maintenance and discharge requirements for Alternatives 3 and 5 are technically more difficult to implement than other alternatives especially in a residential area.

#### Administrative Feasibility

Alternatives 3, 4, and 5 may be administratively difficult to implement because leasing or purchasing of private land would be necessary, and community acceptance of the treatment methodologies and locations of the treatment systems would likely be more difficult than the limited action or no action alternatives. Installation of underground piping, pumps, and groundwater extraction/injection wells would be difficult in a residential area.

#### Availability of Services and Materials

Alternative 1 would not require any services or materials. Alternatives 2-5 would require common construction services and materials for implementation of the remedy.

<u>7. Cost</u>

The present worth for Alternative 5 (\$13.11 million) is the highest, followed by Alternative 3 (\$10.69 million), and then Alternative 4 (\$7.55 million). Alternative 2 (\$1.77 million) has the lowest present worth since it involves no treatment. The costs associated with Alternative 5 are based on a total pumping rate of 110 gallons per minute which could increase significantly when design engineering studies are completed. Alternative 1 has no cost since it involves no action.

#### 8. State Support/Agency Acceptance

The State of New Jersey is still evaluating EPA's preferred alternative presented in this Proposed Plan.

#### 9. Community Acceptance

Community Acceptance of the preferred alternative will be evaluated after the public comment period ends and will be described in the Responsiveness Summary of the Record of Decision (ROD), the document that officially formalizes the selection of the remedy.

#### SUMMARY OF THE PREFERRED ALTERATIVE

Based upon an evaluation of the various alternatives, EPA recommends Alternative 4. *In-Situ* Biological Treatment (Preferred Alternative), for cleanup of the groundwater at the Iceland Coin Laundry Site.

In the Preferred Alternative, amendments such as electron donors and nutrients could be injected into the targeted groundwater plume area to alter the groundwater conditions to promote anaerobic degradation of PCE and TCE to cis-1,2-DCE or methane, ethane and ethene. The breakdown products, cis-1,2-DCE and VC, can easily be degraded under existing Site conditions. In-situ biological treatment would be used to treat the groundwater plume that contains PCE above 10 ppb.

If, during implementation, any residences or businesses within the areal extent of the groundwater contaminant plume are found to have not yet been connected to public water, EPA would offer to connect them, and seal their wells.

Industrial and irrigation water wells in the area would also be evaluated, and a determination will be made regarding their continued use, including the possibility of either closure or treatment prior to use.

While the financial costs of this alternative are relatively high compared with the No-Action or Monitoring Alternatives, those costs are outweighed by the clear benefits of the remedy. The Preferred Alternative does not require long-term operation of

a sector and a sector and and

equipment. As a result, the Preferred Alternative has relatively fewer impacts to the local community than Alternatives 3 and 5 during construction and operation of the action. This alternative would also remediate the VOC plume more quickly than Alternative 5.

Because an estimated 10 to 15 years would be required before complete restoration of the groundwater is achieved from the initiation of the remedy, the Preferred Alternative includes groundwater monitoring to ensure that human health and the environment are protected, and institutional controls such as a Classification Exception Area and well restrictions.

Based on information currently available, EPA believes the Preferred Alternative meets the threshold criteria and provides the best balance of tradeoffs among the other alternatives with respect to the balancing and modifying criteria. EPA expects the Preferred Alternative to satisfy the following statutory requirements of CERCLA §121(b): 1) be protective of human health and the environment; 2) comply with ARARs; 3) be costeffective; 4) utilize permanent solutions and alternative treatment technologies or resource recovery technologies to the maximum extent practicable; and 5) satisfy the preference for treatment as a principal element if treatment of contaminated soil is required prior to disposal.

## **COMMUNITY PARTICIPATION**

EPA and the State of New Jersey provide information regarding the cleanup of the Iceland Coin Laundry Superfund Site to the public through meetings, the Administrative Record file for the Site, and announcements published in The Daily Journal. EPA and the State encourage the public to gain a more comprehensive understanding of the Site and the Superfund activities that have been conducted there.

EPA and NJDEP rely on public input to ensure that the concerns of the community are considered in selecting an effective remedy for each Superfund Site. To this end, the RI and FS reports and this Proposed Plan have been made available to the public for a public comment period which begins on August 5, 2006 and concludes on September 5, 2006.

A public meeting will be held during the public comment period at the Vineland City Hall on August 10, 2006 at 7:00 p.m. to present the conclusions of the RI/FS, to elaborate further on the reasons for recommending the preferred remedy, and to receive public comments.

Comments received at the public meeting, as well as written comments, will be documented in the Responsiveness Summary Section of the ROD, the document which formalizes the selection of the remedy.

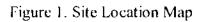
For further information on EPA's preferred alternative for the Iceland Coin Laundry Superfund Site:

Matt Westgate Remedial Project Manager (212) 637-4422 Pat Seppi Community Relations Coordinator (212) 637-3679

## U.S. EPA 290 Broadway 19<sup>th</sup> Floor New York, New York 10007-1866

The EPA Region 2 Regional Public Liaison is: George Zachos Toll-free (888) 283-7626 or (732) 321-6621

> U.S. EPA Region 2 2890 Woodbridge Avenue, MS-211 Edison, NJ 08837



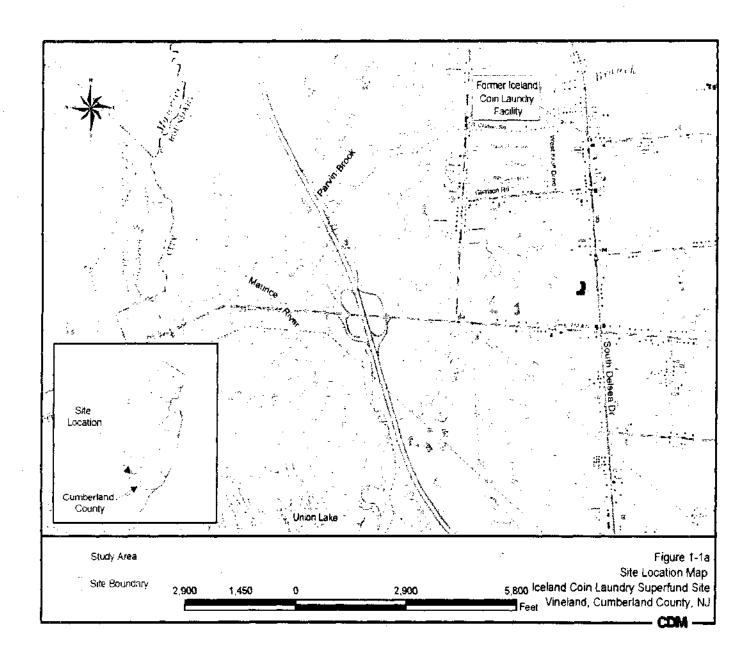
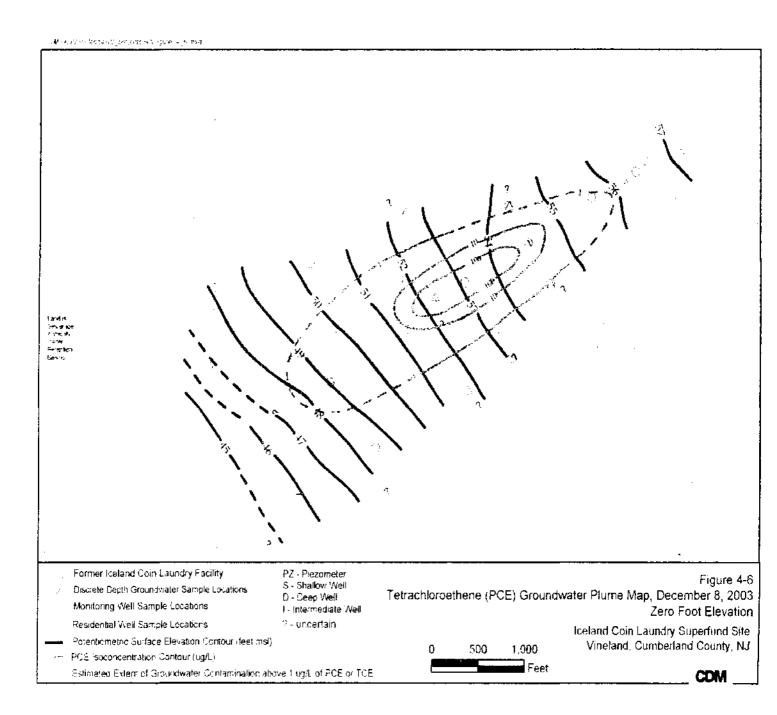


Figure 2 Map illustrating Tetrachloroethylene (PCE) extent of groundwater plume. December 2003.



# ATTACHMENT B

# PUBLIC NOTICE

mission officially canceled sale. The city keeps a \$3,311 sit.

Smart Packaging's niche is og small production runs contract basis with larger ories.

lonald Ayres, city economic elopment director, said rsday that the city has othusinesses interested in the e land. "It's not going to sit e very long," Ayres said.



nter in Vineland the arrival al team. (ssociates Copare) position ( our facility.

Vineland, NJ 08360 8080



s such as shopping or vithout glasses.

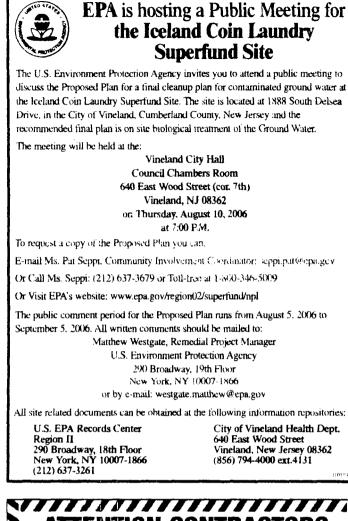
STOR<sup>\*</sup>said they would anted again.

ZOOM" never or only to wear glasses after

art technology can on that you deserve.

-1100

FITUTE ERSEYRC



ATTENTION CONTRACTORS and HOMEOWNERS DINASO & SONS BUILDING SUPPLY, CO. <u>IOW LOW PRICES</u> SPECIAL All Shutters • All Sizes • All Colors Only <sup>\$</sup>12 per Pair

# ATTACHMENT C

# PUBLIC MEETING TRANSCRIPT

1	UNITED STATES
2	ENVIRONMENTAL PROTECTION AGENCY
3	
4	PUBLIC MEETING
5	FOR THE
6	ICELAND COIN LAUNDRY SUPERFUND SITE
7	
8	Thursday, August 10, 2006
9	
10	
11	Transcript of public hearing taken
12	by and before Teresa J. F. Bautz, a Certified
13	Shorthand Reporter, License No. XI02073, and
14	Notary Public of the State of New Jersey, at
15	Vineland City Hall, Council Chambers Room, 640
16	East Wood Street, Vineland, New Jersey, 08362,
17	on the above-mentioned date at 7: 00 p.m.
18	
19	
20	
21	TERESA J. F. BAUTZ Certified Shorthand Reporter
22	14 Davis Avenue, PO Box 49 Shiloh, New Jersey 08353-0049
23	Phone: (856)455-3936 Fax: (856)455-5169
24	
25	

1	PRESENTATION:
2	PAT SEPPI Community Involvement Coordinator
3	MATTHEW WESTGATE
4	EPA Project Manager
5	CHORFAN TSANG, P.E. CDM Project Manager
6	
7	ALSO PRESENT:
8	JEFFREY JOSEPHSON EPA Section Chief
9	THA PECCION CITEL
10	CHLOE METZ EPA Risk Assessor
11	MICHAEL SIVAK
12	EPA Risk Assessor
13	LISA CAMPBELL CDM RI Task Manager
14	CDM KI TASK Manager
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	

1 2 (The hearing commenced at 3 approximately 7:20 p. m.) 4 MS. SEPPI: We're going to get started. First of all , I'd like to thank you 5 for being here tonight. My name is Pat Seppi, б I am the community involvement coordinator for 7 EPA and also for the site, the Iceland Coin 8 Laundry site. I'd like to ask that those 9 people who are here who will be speaking to 10 11 please introduce yourself and tell us your 12 relationship to the site. MR. JOSEPHSON: My name is Jeff 13 14 Josephson. I am included in New Jersey's project state coordination team which is 15 located within EPA Region Two, emergency 16 17 remedial response location. 18 MR. WESTGATE: I'm Matthew Westgate. I'm the project manager for Iceland 19 20 Coin Laundry. 21 MR. TSANG: I'm Frank Tsang. We 22 are the consultant to the EPA. 23 MS. CAMPBELL: I'm Lisa Campbell. 24 I also work for the consultant. 25 MS. METZ: And I'm Chloe Metz.

1 I'm the human health risk assessor. 2 MR. SIVAK: I'm Michael Sivak. I 3 am also a risk assessor assisting Chloe this 4 evening. 5 MS. SEPPI: Thank you. And we also have the assistant to Congressman 6 LoBiondo. And Terri is our stenographer. 7 We're here tonight to present the proposed 8 plan to clean up the Iceland Coin Laundry 9 site. Community involvement is a very 10 11 important part of this process. And that's 12 one of the reasons we have this meeting is to 13 give you an opportunity to listen to the alternatives that we've chosen for the site 14 15 and see what your comments or questions on it 16 are. 17 We also have a public 18 comment period which started on August 5th that will run until September 5th. If you 19 20 should come up with any questions or comments 21 after this meeting, you're certainly welcome to put them in writing or e-mail them to Matt 22 23 Westgate, the project manager, and his address is on the front page of the proposed plan. 24 25 Now, you'll also notice we

1 have Terri here tonight recording this meeting to make sure that your comments do become part 2 3 of the record of decision which will be the final legal document that will detail how we 4 5 plan to clean up the site. But again, we want 6 to make your comments part of the final summary so we certainly take them into 7 consideration. 8 So I told you about the 9 10 public comment period. The only other thing, 11 I hope you signed in. We want to make you 12 part of our mailing list. And there are some handouts there. 13 14 So I think with that I'm 15 going to turn this over to Matt, and he's going to tell you a little bit about the 16 Superfund project. Matt. 17 18 MR. WESTGATE: Okay. Superfund 19 was created in 1980, also known as CERCLA, 20 Comprehensive Environmental Response 21 Compensation Liability Act. And it was created in response to sites like Love Canal 22 23 in upstate New York where they had very big contamination problems and nobody really 24 25 cleaned them up.

1 Superfund looks at toxic waste, disposal disasters. It has two 2 3 branches. There's an emergency response 4 removal program and then there's a long-term 5 cleanup program which we're a part of. In 1986 they amended the 6 7 CERCLA law with superfund amendments and Reauthorization Act. Both of these combined 8 provide federal funds for clean up of 9 10 hazardous waste sites and to respond to those 11 emergencies involving hazardous substances. 12 Superfund empowers EPA to compel responsible parties to pay for or to 13 14 conduct the necessary response actions. The 15 superfund process starts with site discovery and ranking where we do site investigation, 16 17 preliminary groundwater sampling, surface soil 18 sampling. And we actually rank the 19 contamination as compared to what receptors 20 might be impacted. When the site ranks at a 21 certain level it's put on the national 22 priorities list which then will trigger a remedial investigation feasibility study which 23 24 is a very thorough and detailed investigation of contamination to determine the area, extent 25

б

1 and levels of contamination, physical

2 properties of the site.

3 Once we have a very good idea of what the contamination situation looks 4 5 like, we come up with alternatives for cleaning it up. And under the legislation we 6 prepare the alternatives or we analyze the 7 alternatives with respect to nine criteria 8 which are listed there. 9 10 Protection of human health 11 and environment, number one; compliance with 12 applicable or relevant and appropriate requirements, basic regulatory part of it. We 13 14 look at the alternatives with long-term 15 effectiveness and permanence in mind; reduction of toxicity, mobility or volume of 16 the material; short-term effectiveness; 17 18 implementability; cost is a factor; State acceptance and the community acceptance. 19 20 At that point we come up 21 with a proposed remedy, and this meeting is an example of how we put that proposed remedy out 22 23 in the public and try and get feedback from as many people as we can. We pick one of the 24 alternatives and that decision is documented 25

in what's called Record of Decision which
 basically lays out the approach for the design
 and the remedial action to take care of the
 problem.

After remedial action we're 5 not completely finished yet. There's a 6 7 five-year review process where we go back and look at the site to see the effectiveness of 8 9 the remedy and make sure that there's no changed conditions that might affect that. We 10 11 also consider changes in the regulations 12 regarding the toxicity of the contaminants of 13 concern. If the standards have gotten more 14 stringent, then we might have to re-look at 15 what choices we made in the ROD. 16 I'm going to turn the

17 presentation over to Frank who is going to 18 briefly describe what his company did in terms 19 of remedial investigation on the site.

20 MR. TSANG: Good evening again. 21 The former Iceland Coin Laundry facility is 22 located at 1888 South Delsea Drive. The 23 remedial investigation covered the former 24 facility property as well as the area 25 downgradient of the facility. Iceland Coin 1 Laundry and Dry Cleaning operated from approximately 1953 until at least 1971. The 2 3 facility had four coin operated dry cleaning units inside. It reportedly used 4 5 tetrachloroethylene, also referred to and commonly referred to as PCE, as the dry 6 cleaning fluid. 7 In 1987 the City of Vineland 8 Health Department found trichloroethene, 9 10 commonly referred to as TCE, in reception 11 wells downgradient from the facility. 12 Subsequent sampling of the residential wells found PCE, TCE and also 1,2-dichloroethene, 13 also referred to as DCE. Both TCE and DCE are 14 15 degradation products of PCE. In 1994 public water supply 16 was provided to the affected residences except 17 18 at one house. The owner refused to be connected to the public water supply, and upon 19 20 entry a cleanup unit was provided in the 21 house. The site was placed on the national 22 priority list in October 1999. CDM performed the remedial 23 investigation from June 2003 to December 2003 24 25 and it consisted of two parts, the source area

1 Investigation and the groundwater

2 Investigation. The source area Investigation 3 focused on the facility property Itself. The 4 Investigation used a phased approach In the 5 investigation and did the investigation in 6 phases.

7 The first phase we used the surface geophysical survey to locate any 8 subsurface structures that may act as a 9 continued source of groundwater contamination. 10 11 Using the results of the geophysical survey, 12 CDM then performed subsurface soil screening 13 using what they call membrane interface probe. 14 Basically detectors are 15 installed at the tip of the probe, and the probe was pushed in the ground. The detectors 16 17 provide a continual and instantaneous reading 18 of the contaminant concentrations in the ground. And using the screening results we 19 20 locate our soil samples, and we collected ten 21 soil surface samples and five subsurface soil 22 samples. This slide shows the MIP 23

24 screening location. Basically we spread them 25 out, you know, back here (indicating) because

1 it was reported that the owner burned the lint filters from the dry cleaning unit back in the 2 3 area. We put the screening location in the 4 front (indicating) because we want to look for 5 any source material down here because allegedly these are the locations for the 6 cesspool and the drain field for the facility. 7 And this slide shows the 8 surface soil sample location, and basically 9 these are more evenly distributed throughout 10 11 the facility. 12 The result of the soil area investigation showed that only very low levels 13 of PCE which are below the screening criteria 14 were detected in on-site soil. And based on 15 the results, there are currently no 16 contaminant sources on-site that contribute to 17 18 the groundwater contamination. Groundwater investigation 19 20 focused on the area downgradient from the 21 facility. Again, the investigation was conducted in phases. We screened the 22 23 groundwater samples first to optimize the location for the monitoring wells. As a 24 25 result of the screening investigation, CDM

1 then installed 27 shallow, intermediate and deep monitoring wells throughout the plume 2 3 area. Then we collected two rounds of samples 4 from the monitoring wells and also collected 5 water samples from two residential wells. This slide shows the extent 6 7 of PCE contamination. The highest detected PCE concentration is located in the middle of 8 the plume where this triangle is. 9 Concentration is about 290 micrograms per 10 11 liter as compared to the drinking water 12 standard of 1 microgram per liter. 13 As you can see, the core of the plume, we call this the core of the plume, 14 which is a concentration of above 10 15 micrograms per liter has migrated away from 16 17 the former facility. The reason for that is 18 there's no existing source at the facility as the facility shut down back in the early '70s, 19 20 and as groundwater moved through the area it 21 flushed the plume core to the current location and it will continue to migrate if not 22 remediated. 23 This slide shows the extent 24 25 of TCE plume. TCE plume is pretty much at the

1 same location as the PCE plume, however at a concentration much less than the PCE 2 3 concentrations. The highest detected TCE 4 concentration is only 17 micrograms per liter 5 as compared to the drinking water standard of 6 1 microgram per liter. As part of the remedial 7 investigation a human health risk assessment 8 was conducted. The human health risk 9 assessment is a measure of potential risks of 10 11 developing cancer or potential for non-cancer 12 health effects. Cancer risk is expressed as a 13 probability of increased cancer within a 14 certain population. EPA's target cancer risk 15 range is one extra case of cancer in a population of a million people to one extra 16 17 case in 10,000 people. 18 For the non-cancer health effects it measures by comparing the exposure 19 20 concentrations to the threshold levels. The 21 threshold levels are the level that no adverse 22 effects are going to be observed. The non-cancer health effects are measured as 23 hazard index. The EPA's target hazard index 24 25 is one.

1 Now, to calculate the risks for the site, you know, we created scenarios. 2 3 These scenarios include receptors and 4 pathways, you know. The receptors could be 5 hypothetical. Let's see, we turn the current retail facility into a home and have people 6 live in there, so we call it a future 7 residence. And then for the downgradient area 8 we also include the current residence, that 9 people live in the house. Also in the future 10 11 people can live in the house, but we also 12 assume some hypothetical pathway, the way you expose the contaminants. 13 14 Currently all the affected 15 residents in the plume area have been provided with public water supply so they are not 16 17 drinking the water. Therefore the risk 18 assessment, we assume they are drinking the water. So there's a very conservative way to 19 20 look at the risk. 21 And also we use some very conservative number, you know, the frequency 22 23 of exposure, the contaminant concentrations and the body weight are very conservative 24 25 numbers put into the risk models and come up

1 with t

with the risk values.

After we finished risk 2 3 calculations, then we compare the risk results 4 to EPA's target value on target risk ranges. The conclusion from that is that the current 5 and the future residents and site workers 6 7 exceed the target risk range mainly from direct exposure to contaminated groundwater. 8 PCE and TCE are the two major contaminants 9 that contribute to the most risks. 10 11 The EPA also determined that 12 there's a potential for PCE or TCE vapor intrusion into the former facility and 13 contaminated groundwater. As a result EPA 14 decided to conduct additional investigation 15 16 during the remedial design phase to look into 17 this potential pathway. 18 And then we move into the feasibility study. The feasibility study 19 20 involves several steps. First step is to 21 establish the remedial action objectives, which are media specific, which are goals for 22 23 the protection of human health and involvement. In order to measure the 24 25 achievement of the remedial action objectives,

1 clean up levels, also referred to as preliminary remediation goals, were developed. 2 The next step in the study 3 4 is to identify any applicable remedial 5 technologies and also go through the evaluation process. The technologies that are 6 determined to be effective and implementable 7 are retained and then combined into 8 alternatives. The alternatives then are 9 evaluated using nine criteria that Matt said 10 11 to you earlier. 12 The EPA has established two 13 remedial action objectives for this site. Our 14 first objective is to prevent ingestion of and 15 dermal contact with contaminated groundwater. That is mainly to address the risks result 16 17 that we discussed earlier. As I mentioned 18 earlier, currently the public water supply has been provided for the affected residences, so 19 20 there's no current exposures. But we want to 21 make sure that there's no future exposure too. So EPA would establish a restriction in the 22 23 use of contaminated groundwater through 24 drinking water well drilling, a permit 25 restriction with the help of New Jersey

1 Department of Environmental Protection. The second remedial action 2 3 objective for the site is to restore the groundwater aquifer to the cleaned up levels 4 within a reasonable time frame. EPA has 5 selected New Jersey Groundwater Quality 6 Standards as the clean up levels. The New 7 Jersey Groundwater Quality Standards have the 8 same numerical values as the drinking water 9 standard for these three contaminants. 10 11 Five remedial action 12 alternatives were developed for the site. The first alternative is no action. Actually, the 13 14 name implies no further action would be implemented on-site under this alternative. 15 This alternative is required under the 16 superfund program as the baseline for 17 18 comparison to the other alternatives that are 19 listed here. 20 Alternative two is 21 institutional controls and long-term monitoring. Alternatives three through five 22 are active treatment alternatives that use the 23 24 various treatment technologies, and we will get into those four alternatives in more 25

1 detail in the next couple sides.

2 Under alternative two, as I 3 mentioned earlier, EPA would implement these two controls with assistance from New Jersey 4 DEP to restrict the use of contaminated 5 groundwater. Basically the restriction would 6 7 deny any drinking water well permit within the contaminated plume area. EPA would also 8 monitor the contaminated groundwater movement 9 and migration, degradation, for the next 30 10 11 years. 12 Because the groundwater will 13 migrate over time and based on the monitoring 14 result, EPA would perform periodic investigation of the current condition of the 15 plume at that time. Because contamination 16 17 remained on site, EPA would perform a review

of the site conditions every five years to ensure the site will continue to protect the health and the environment. As required by EPA's guidelines, this alternative will continue for 30 years.

Before I discuss and present
to you the detail of alternatives three to
five, I would like to talk about common

1 elements for these three alternatives. Two areas would be targeted for treatment under 2 3 alternatives three to five. The first area is 4 the plume core. The plume core has the bulk of the contamination. The folks for the 5 feasibility study would define the plume core 6 7 as any PCE or TCE concentration about 10 micrograms per liter as shown by this figure 8 within the pink line here. It's not as clear 9 10 on this figure.

11 The second area is at the 12 former facility. During the groundwater screening investigation residual contamination 13 14 was found at one screening location. However, 15 when we collected groundwater samples from the monitoring wells about 100 feet away from that 16 17 screening location, we did find contamination 18 in the groundwater. As a result, EPA would conduct additional investigation during the 19 20 design phase to confirm existence of 21 contamination at these locations. When the contamination is confirmed, then we will 22 23 implement treatment at that location. 24 EPA would also utilize the 25 natural processes to attenuate the very low

1 concentrations of TCE and PCE contamination at the fringe area of the plume. 2 3 Also there are two other 4 common elements, the institutional controls 5 and long-term monitoring, and they are the same as discussed under alternative two. 6 7 Under alternative three, the in-situ physical and chemical treatment, we 8 would use groundwater circulation well 9 technology to treat the PCE and TCE plume 10 11 core. The groundwater circulation well is a 12 specially-designed well that contains two 13 parts. One part is to extract the groundwater 14 from the ground and pump it to the surface. 15 The groundwater is then treated, and then we inject through the second part of the well 16 17 back into the aquifer. 18 Because it's an innovative technology, pilot studies would be performed 19 20 to evaluate the effectiveness and also to 21 obtain the design parameters for this 22 technology. And at the former facility we 23 would implement in-situ chemical oxidation which treat the residual soil contamination if 24 25 it is confirmed through the predesign

investigation.

1

Also, basically for the 2 3 in-situ chemical oxidation we would utilize oxidants such as Protexin permanganate. We 4 5 would Inject the chemical Into the ground and oxidize the PCE and TCE Into a nontoxic 6 chemical such as carbon dioxide, water and 7 salt. It would take about two years to 8 construct the multiple groundwater circulation 9 wells for this site, and it would take about 10 11 ten years to treat the plume core. And EPA 12 would monitor the plume fringe for the next 30 years under this alternative. 13 Under alternative four we 14 15 will utilize in-situ biological treatment to treat the plume core as well as the residual 16 soil contamination at the former facility. 17 18 In-situ biological treatment has been successfully implemented at many other sites. 19 20 We will perform bench and pilot studies to 21 obtain the design parameters. The advantage of in-situ biological treatment for this site 22 23 is that there are no permanent structures 24 on-site. There are no long-term operations 25 involved.

1 We would inject amendments such as nutrients and electron donors into the 2 ground. All the biological activity is in the 3 aquifer itself and we estimate it would take 4 5 about three to six months to inject one round of the amendments. And we estimate it would 6 7 take two to three rounds of injections over a 10-year period to complete the treatment of 8 the plume core. 9 EPA would then monitor the 10 11 plume fringe for the next 30 years. So 12 there's not a lot of operation at the site under this alternative. 13 14 Alternative five is pump and 15 treat. Basically groundwater would be extracted using multiple extraction wells. 16 17 Pump the water to the surface and treat it 18 using conventional treatments such as granular activated carbon. The treated water would 19 20 then be recharged back into the aquifer. 21 During the design phase 22 groundwater modeling would be performed to determine the number of extraction wells, the 23 well locations and also the pumping rates of 24 the well. Again, we'll use in-situ oxidation 25

1 to treat the residual soil contaminants at the former facilities. 2 3 It will take, well, it will 4 take about two years to finish constructions 5 and will take more than 30 years to treat the plume core under this alternative. And this 6 slide summarizes the cost estimate for the 7 various alternatives. Alternative two is 8 \$1.8 million, alternative three is \$10.7 9 million, alternative four is \$7.5 million. 10 11 And alternative five would be most likely 12 exceed \$13.1 million. 13 Now we give the presentation back to Matt for the preferred alternative. 14 15 MR. WESTGATE: After going through all these different alternatives and 16 17 consulting with the State, we picked 18 alternative four which is the in-situ biological treatment. When you consider 19 20 things like cost and implementability, this 21 will certainly achieve the goals in a reasonable time for a reasonable price. 22 23 It does not require 24 long-term operation of equipment. It has 25 relatively few impacts to the local community,

1 fewer impacts to the local community than the other alternatives. It provides the best 2 3 balance of trade-offs among the alternatives. 4 And we figure that groundwater could be 5 restored in 10 to 15 years. We would also satisfy the 6 7 statutory requirements and protect both human health and the environment. We would comply 8 with state laws, be cost effective and it 9 would utilize permanent solutions and 10 11 alternative treatment technologies or resource 12 recovery technologies to the maximum extent 13 practicable. And it would satisfy the 14 preference for treatment as the principal 15 element. We ask for any input from 16 17 the public on our decision and any questions 18 at this point. MS. SEPPI: Well, I thank you 19 20 very much for coming tonight, listening to our 21 presentation. If you talk to anyone you know, 22 please tell them about the public comment 23 period. They can certainly get comments to Matt either written or through e-mail. And 24 25 thank the congressman for his continued

1	Interest In the site. We do appreciate that.
2	And again, if you have any questions, contact
3	me any time. Thank you all very much.
4	(The hearing concluded at
5	approximately 7:51 p.m.)
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	

1	CERTIFICATION
2	
3	STATE OF NEW JERSEY
4	SS.
5	COUNTY OF CUMBERLAND
б	
7	I, TERESA J. F. BAUTZ, a
8	Certified Shorthand Reporter and Notary Public
9	of the State of New Jersey, do hereby certify
10	that I reported the testimony in the
11	above-captioned matter; that the said
12	witnesses were duly sworn by me; that the
13	foregoing is a true and correct transcript of
14	the stenographic notes of testimony taken by
15	me in the above-captioned matter.
16	
17	I FURTHER CERTIFY that I am not
18	an attorney of counsel of any of the parties,
19	nor a relative or employee of any attorney or
20	counsel in connection with the action, nor
21	financially interested in the action.
22	
23	TERESA J.F. BAUTZ, CSR #XI02073
24	
25	

# ATTACHMENT D

# WRITTEN COMMENTS

No written comments submitted to EPA.