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2003

# EPA Superfund
# Record of Decision:

**CORNELL DUBILIER ELECTRONICS INC.**
**EPA ID: NJD981557879**
**OU 01**
**SOUTH PLAINFIELD, NJ**
**09/30/2003**

# RECORD OF DECISION

**Operable Unit One**

**Cornell-Dubilier Electronics Superfund Site**

**South Plainfield, Middlesex County, New Jersey**

**United States Environmental Protection Agency**
**Region II**
**September 2003**

# DECLARATION STATEMENT

## RECORD OF DECISION

### SITE NAME AND LOCATION

Cornell-Dubilier Electronics, Inc. Site (EPA ID#NJD981557879)
Borough of South Plainfield, Middlesex County, New Jersey
Operable Unit 1

### STATEMENT OF BASIS AND PURPOSE

This decision document presents the Selected Remedy to address Operable Unit 1 of the Cornell-Dubilier Electronics Superfund Site (the "Site"), consisting of contaminated soil and interior dust at properties in the vicinity of the former Cornell-Dubilier Electronics (CDE) facility, in South Plainfield, New Jersey, which was chosen in accordance with the Comprehensive Environmental Response, Compensation and Liability Act, as amended (CERCLA), and to the extent practicable, the National Oil and Hazardous Substances Pollution Contingency Plan. This decision is based on the Administrative Record file for the Site.

The State of New Jersey does not concur with EPA's Remediation Goal of 1 part per million (1 ppm) for polychlorinated biphenyls (PCBs) in soil. However, the State otherwise 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, 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 described in this document involves the remediation of PCB contamination that is found on residential, commercial, and municipal properties located in the vicinity of the former CDE facility. This is the first of three planned remedial phases, or operable units, for the CDE Site, identified as Operable Unit 1 (OU1). A second operable unit is planned to address the contaminated soils and buildings at the former CDE facility, and a third and final operable unit will address contaminated groundwater at the Site, and contaminated sediments of the Bound Brook. The major components of the Selected Remedy include:

- excavation of an estimated 2,100 cubic yards of contaminated soil from approximately 16 properties, backfilling with clean fill, and property restoration as necessary;

- transportation of the contaminated soil off-site for disposal, with treatment as necessary;

- indoor dust remediation where PCB-contaminated dust is encountered; and,

- where necessary, temporary relocation of residents during the indoor remediation.

As described in more detail in the Decision Summary, EPA' s studies to date have identified four properties where actions need to be taken, and a study area of approximately 59 properties that require expanded soil and interior dust sampling to . determine if additional properties require remediation. EPA has estimated that this sampling may identify as many as 12 additional properties, and the Selected Remedy takes into account the likelihood that some of these properties may require some degree of remedial response. In addition, the Selected Remedy requires a re-evaluation of the 13 residential properties where soil removal actions have already been performed, to ensure that those cleanups.. are consistent with the remediation goals established here. The Selected Remedy will be the final remedy for properties in the vicinity of the CDE Site.

## 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 legally applicable or relevant and appropriate to the remedial action, and is cost-effective. The Selected Remedy utilizes permanent solutions and alternative treatment (or resource recovery) technologies to the maximum extent practicable.

### Part 2: Statutory Preference for Treatment

Based on the sampling performed to date, the contaminated soil will not require treatment to meet the requirements of off-site disposal facilities. The Selected Remedy does not meet the statutory preference for the use of remedies that employ treatment that reduces toxicity, mobility or volume as a principal element.

### Part 3: Five-Year Review Requirements

Because the Selected Remedy will not result in hazardous substances remaining on affected properties above health-based levels, a statutory five-year review is not required.

## ROD DATA CERTIFICATION CHECKLIST

The following information is included in the Decision Summary section of this ROD. Additional information can be found in the Administrative Record for this 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 are discussed in the "Remedial Action Objectives" section.

- Estimated capital, annual operation and maintenance (O&M), and total present worth costs are discussed in the "Description of Alternatives" section.

- Key factors 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 decisions) may be found in the "Comparative Analysis of Alternatives" and "Statutory Determinations" sections.

Jane M. Kenny
Regional Administrator
Region II

9/30/13
Date

# DECISION SUMMARY

**Operable Unit One**

**Cornell-Dubilier Electronics Superfund Site**

**South Plainfield, Middlesex County, New Jersey**

**United States Environmental Protection Agency**
**Region II**
**September 2003**

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## SITE NAME, LOCATION AND DESCRIPTION

The Cornell-Dubilier Electronics (CDE) Site is located at 333 Hamilton Boulevard, South Plainfield, Middlesex County, New Jersey. The Site includes three operable units. Operable Unit 1 (OU1) consists of residential, commercial, and municipal properties located in the vicinity of the former CDE facility. Operable Unit 2 (OU2) addresses contaminated soils and buildings at the former CDE facility. The third and final operable unit (OU3) will address contaminated groundwater and contaminated sediments of the Bound Brook.

The former CDE facility, now known as the Hamilton Industrial Park, consists of approximately 26 acres containing 18 buildings that are currently used by a variety of commercial and industrial tenants. The facility is bounded on the northeast by the Bound Brook and the former Lehigh Valley Railroad, Perth Amboy Branch (presently Conrail); on the southeast by the Bound Brook and a property used by the South Plainfield Department of Public Works; on the southwest, across Spicer Avenue, by single-family residential properties; and on the northwest, across Hamilton Boulevard, by mixed residential and commercial properties (see Appendix I, Figure 1).

CDE operated at the Site from 1936 to 1962, manufacturing electronic components including, in particular, capacitors. PCBs and chlorinated organic solvents were used in the manufacturing process, and it has been alleged that during CDE's period of operation, the company disposed of PCB-contaminated materials and other hazardous substances at the Site. These activities evidently led to widespread chemical contamination at the facility, as well as migration of contaminants to areas nearby. PCBs have been detected in the groundwater, soils and in building interiors at the industrial park, at adjacent residential, commercial, and municipal properties, and in the surface water and sediments of the Bound Brook. High levels of volatile organic compounds (VOCs) have been found in the facility soils and in groundwater. Since CDE's departure from the facility in 1962, it has been operated as a rental property, with over 100 commercial and industrial companies operating at the facility as tenants.

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

## SITE HISTORY AND ENFORCEMENT ACTIVITIES

### Operations and State and Federal Response Actions

In June 1994, at the request of the New Jersey Department of Environmental Protection (NJDEP), EPA collected and analyzed soil, surface water and sediments at the facility. The results of the sample analyses revealed that elevated levels of PCBs, volatile organic compounds (VOCs), and inorganic chemicals were present at the Site.

In February, June and July 1996, EPA collected and analyzed additional soil samples at the facility. The results confirmed the presence of elevated levels of PCBs, and also identified the presence of elevated levels of lead.

As a result of the contamination found at the facility, in March 1997, EPA ordered the owner of the facility property, D.S.C. of Newark Enterprises, Inc. (DSC), a potentially responsible party (PRP), to perform a removal action to mitigate risks associated with contaminated soil and surface water runoff from the facility. The removal action included paving driveways and parking areas in the industrial park, installing a security fence, and implementing drainage controls.

In 1997, EPA conducted a preliminary investigation of the Bound Brook to evaluate the potential impacts of contamination on human health and the environment. Elevated levels of PCBs were found in fish and sediments of the Bound Brook. As a result of these investigations, NJDEP issued a fish consumption advisory for the Bound Brook and its tributaries, including New Market Pond and Spring Lake.

In October and November 1997, EPA collected soil and indoor dust samples from residential properties on Spicer Avenue, near the facility property. EPA and the Agency for Toxic Substances and Disease Registry (ATSDR) reviewed the data obtained from this sampling and concluded that exposure to PCBs in dust and soil posed a potential health concern for residents at several of the properties tested. To limit the potential for exposure to PCBs until a final remedy could be selected, EPA initiated another removal action to clean the interiors of seven homes on Spicer Avenue, Garibaldi Avenue, and Hamilton Boulevard. EPA performed interior cleaning on seven properties, and entered into an administrative order on consent (AOC) with DSC and CDE for removal of contaminated soil from six properties. Interior dust remediation was completed in April 1998, and removal of PCB-contaminated soil was completed in September 1999.

Because of contamination found on residential properties in 1997, in 1998, EPA expanded its investigation to Delmore Avenue and Hamilton Boulevard near the industrial park. Again, EPA determined that PCBs found in dust and soil posed a potential health concern for residents. EPA cleaned the interiors of eight homes on Delmore Avenue and Hamilton Boulevard, and entered into an AOC with CDE and Dana Corporation (Dana), another PRP, for removal of contaminated soil from seven properties. These removal actions were completed in January 2000, further limiting the potential for exposure until a final remedy could be selected.

In July 1998, EPA included the Site on the NPL.

## Enforcement Activities

To date, PRPs identified for the Site and served with notices of liability include DSC, CDE, Dana, Dana Corporation Foundation, and Federal Pacific Electric Company. Five administrative orders have been issued to various PRPs for the performance of portions of removal actions required at the Site. The first order, a Unilateral Administrative Order (UAO) issued to DSC in 1997, required the installation and maintenance of site stabilization measures to limit migration of contaminants from the industrial park. These actions included paving driveways and parking areas in the industrial park to minimize dust, installing a security fence, and implementing drainage controls to limit surface run-off.

In 1998 and 1999, EPA entered into two AOCs with PRPs concerning the removal of PCB-contaminated soil from six properties on Spicer Avenue (referred to by EPA as the "Tier I" properties), and from seven properties on Delmore Avenue and Hamilton Boulevard (referred to by EPA as the "Tier II" properties), respectively (see Appendix I, Figure 2 and 3). DSC and CDE signed the 1998 AOC, and Dana and CDE signed the 1999 AOC. EPA issued another UAO in 1999 to Federal Pacific Electric and DSC, requiring those parties to participate and cooperate in the soil removal at the Tier II properties being performed by Dana and CDE. In April 2000, EPA entered into an AOC with DSC requiring the removal of PCB-contaminated soil from one additional property on Spicer Avenue. DSC agreed to perform the work required under the AOC, but failed to do so. EPA anticipates the soil excavation at this property will be performed later this year.

In July 1998, EPA offered the PRPs an opportunity to perform a comprehensive study of the Site, called a Remedial Investigation and Feasibility Study (RI/FS), to help determine the nature and

extent of contamination. After EPA and the PRPs were unable to agree on the scope of the remedial investigation required at the Site, EPA elected to perform the RI/FS using federal funds.

In 2000, CDE and Dana initiated discussions with the Borough of South Plainfield regarding the potential redevelopment of the Hamilton Industrial Park, and how that redevelopment might be accomplished as part of a remedy for the facility soils and buildings. South Plainfield's redevelopment planning for the facility will be considered by EPA in performing a FS and developing a remedy for OU2, which includes the facility property.

## HIGHLIGHTS OF COMMUNITY PARTICIPATION

EPA has worked closely with public officials and other interested members of the community. Their participation and contributions to the site investigation and remediation process have benefitted and continue to benefit the Agency in achieving its goal of effectively protecting human health and the environment.

The Proposed Plan and supporting documentation for OU1 were released to the public for comment on June 16, 2003. These documents were made available to the public at the EPA Administrative Record File Room, 290 Broadway, 18th Floor, New York, New York; and at the South Plainfield Public Library, 2484 Plainfield Avenue, South Plainfield, New Jersey.

The public comment period began on June 16, 2003 and ended on July 16, 2003. On June 16, 2003, EPA published a notice in the Courier-News newspaper containing. information concerning the public comment period for the Site, including the duration of the comment period, the date of the public meeting and availability of the administrative record. A second notice was placed in the Observer-Tribune newspaper on June 19, 2003. A public meeting was held on June 23, 2003, at the South Plainfield Municipal Building located at 2480 Plainfield

Avenue, South Plainfield, New Jersey. The purpose of this meeting was to inform local officials and interested citizens about the Superfund process, to discuss the Proposed Plan and receive comments on the Proposed Plan, and to respond to questions from area residents and other interested parties. Responses to the comments received at the public meeting and in writing during the public comment period are included in the Responsiveness Summary, attached as Appendix V to this ROD.

## SCOPE AND ROLE OF THIS OPERABLE UNIT

To expedite the cleanup of the CDE Site, EPA has divided the Site into remedial action phases or operable units (OUs). OU1 addresses PCB-contaminated soil and interior dust on residential/ commercial, and municipal properties located in the vicinity of the former CDE facility. EPA's remedial investigations of the industrial park soil and building contamination, the groundwater, and sediment contamination in the Bound Brook are ongoing, and future operable units will address other contamination problems posed by the Site. A second operable unit (OU2) is planned to address the contaminated soils and buildings at the former CDE facility, and a third and final operable unit (OU3) will address contaminated groundwater from the site, and contaminated sediments of the Bound Brook.

## SUMMARY OF SITE CHARACTERISTICS

### Sampling Approach

Soil samples collected during the RI from the residential, commercial, and municipal properties in the vicinity of the CDE facility were analyzed for PCBs. PCBs were identified as the contaminant of concern in previous investigations that started in 1994. PCBs were analyzed using EPA's standard sampling methodology that identifies PCBs in the environment as Aroclors. "Aroclor" is the trade name given to commercially manufactured mixtures of PCBs. The different mixtures are identified with a four digit number (e. g., Aroclor-1254). Aroclors were chosen for evaluation because they were used in the former manufacturing processes at the CDE facility and are bioaccumulative and persistent in the environment. The Aroclors detected at the properties in the vicinity of the CDE facility are Aroclor-1254 and Aroclor-1260. The range of detected concentrations for the chemicals of concern (COC) and frequency of detection (i.e., the number of times the chemical was detected in the samples collected) for select properties during the RI are presented in Appendix II, Table 2.

EPA’s August 1990 guidance, entitled "Guidance on Remedial Actions at Superfund Sites with PCB Contamination", recommends a cleanup goal of 1 ppm for unrestricted residential land use. During the RI and earlier studies, 1 ppm was used as a soil screening value and is the Remediation Goal for the Site. The State of New Jersey has developed a residential direct contact soil cleanup criterion (RDCSCC) for PCBs of 0.49 ppm. Results from the RI that exceeded the State's RDCSCC were also reported.

During the summer of 2000, EPA collected samples at 807 locations as part of the OU1 RI. When the earlier removal investigations are also considered, EPA's sampling program surveyed an area covering approximately 135 acres. During the RI, EPA also targeted a group of 19 residential, commercial, and municipal properties in the vicinity of the CDE facility for extensive surface and subsurface PCB testing. Some of these 19 properties were in areas where previous testing had indicated a higher likelihood of finding elevated PCB levels, while others were in areas further from the facility, where no elevated PCB levels were anticipated.

In addition, EPA collected. samples along the curbside right-of-ways (generally, the two feet of property adjacent to the curb) in areas around the CDE facility to provide a broader scope to the investigation and identify PCB distribution trends that would not be found by sampling only individual properties. The curbside sampling was performed along 13 roadways in the vicinity of the CDE facility, including curbside right-of-ways within the Bound Brook flood plain, located downstream (northwest) of the CDE facility.

Furthermore, during the earlier removal investigations, EPA collected curbside samples from properties along Delmore, Arlington, Hancock and Belmont Avenues (referred to by EPA as the "Tier III" properties). The Tier III curbside sampling survey consisted of 74 surface soil samples.

The soil remedial investigation indicated the following:

**Surface Contamination**

- Of the 807 samples collected during the RI, 630 were surface soil samples collected within the first few inches of the ground surface. PCB concentrations ranged from non-detect to 57 ppm. Of these 630 samples, 20 samples exceeded 1 ppm total PCBs.

- Of the 74 Tier III surface soil samples collected prior to the start of the RI, PCB concentrations ranged from 0.022 ppm to 2.9 ppm. Of these 74 samples, 9 samples exceeded 1 ppm total PCBs.

**Subsurface Contamination**

- Of the 177 subsurface soil samples from the RI (collected at 16 to 18 inches below ground surface), 5 samples exceeded 1 ppm total PCBs. Concentrations in three of the five samples had an average of 1.3 ppm; the other two samples had concentrations of 44 ppm and 310 ppm.

**Results from the 19 Targeted Properties**

- Of the 807 RI samples, 411 were collected on these 19 properties. Eighteen of the 25 RI samples found to contain concentrations of PCBs in excess of 1 ppm were collected during this phase of the investigation. Of the 19 properties surveyed (approximately 20 samples per property, both surface and subsurface), only three properties were identified with elevated levels of PCBs.

**Results from the Curbside Right-of-Way Sampling**

- Of the 807 RI samples, 396 were collected during the curbside right-of-way sampling. Seven of the 25 RI samples found to contain concentrations of PCBs in excess of 1 ppm were collected during this phase of the investigation. The curbside sampling results indicated more frequent detections on blocks nearer the CDE facility and on high-traffic streets like Hamilton Boulevard and New Market Avenue. These data trends support a pattern of wind-blown or vehicle-carried contamination from the facility.

**Bound Brook Floodplain Property Sampling**

- Of the 807 RI samples, 174 were collected from residential properties and public curbside right-of-ways within the Bound Brook floodplain, located downstream (northwest) of the CDE facility (please refer to Appendix I, Figure 1). None of the 174 surface and subsurface soil samples collected in this area exceeded 1 ppm total PCBs.

**Additional Data Needs**

The majority of the PCB measurements detected during the RI were in the surface samples, collected in the first few inches of soil. EPA analyzed data from the RI and the earlier removal investigations, and has targeted at least 59 properties where additional soil sampling is called for. Figure 4 (see Appendix I) illustrates the RI study area and where additional testing is necessary. Figure 5 identifies the properties where additional testing is necessary because the curbside right-of-way sampling results exceeded EPA's Remediation Goal of 1 ppm and New Jersey's RDCSCC of 0.49 ppm. Based upon EPA's experience with the testing performed to date, EPA has conservatively estimated that approximately 12 properties may be identified with at least some PCB levels exceeding EPA's Remediation Goal.

During earlier removal activities, PCBs were measured in residential indoor dust. The dust measurements were sporadic in nature and not necessarily correlated with higher levels of PCBs in surface soils; and unlike the soil sampling analysis described above, EPA has not identified a pattern to the indoor dust measurements. Nevertheless, additional indoor dust testing for PCBs is called for, to ensure that PCBs are not present at elevated concentrations. EPA anticipates that the dust sampling will be performed on a subset of the 59 properties identified for soil sampling. EPA has conservatively estimated that up to seven additional properties may be identified with elevated PCBs in indoor dust during these expanded property investigations. Indoor dust remediation will be performed where PCB-contaminated dust is encountered at levels in excess of EPA's Remediation Goal of 1 ppm.

It should be noted that the number of properties described herein as containing elevated levels of PCBs is based on an estimate developed by EPA to calculate the approximate costs of the cleanup alternatives. The precise number of properties that will require either soil remediation or interior cleaning under the Selected Remedy will be determined upon the completion of the additional sampling required as part of the OU1 remedy.

## CURRENT AND POTENTIAL FUTURE SITE AND RESOURCE USES

**Site Uses**: Currently, the properties in the vicinity of the CDE facility are divided into two land uses: residential and commercial. Based upon discussions with the Borough of South Plainfield, EPA does not expect the zoning of these properties to change in the near future. In December 2001, the Borough of South Plainfield adopted a resolution designating the Hamilton Industrial Park (OU2) and certain properties in the vicinity of the industrial park as a "Redevelopment Area" pursuant to the New Jersey Local Redevelopment and Housing Law. South Plainfield retained a planning. consultant to prepare a redevelopment plan for the designated area, and on July 15, 2002, the Borough of South Plainfield approved the redevelopment plan. The redevelopment plan does not require re-zoning of the properties that are part of OU1.

**Resource Uses**: No wetlands are associated with these properties. Groundwater and surface water in the area are both current and potential future sources of drinking water. The groundwater beneath the Site is classified by NJDEP as Class IIA, and potable water wells for the Middlesex Water Company and the Elizabethtown Water Company facility are located within four miles of the Site. EPA is currently evaluating the potential for the Site to adversely impact the groundwater. Groundwater will be addressed in a subsequent OU3 for the Site.

## SUMMARY OF SITE RISKS

As part of the RI/FS, EPA conducted a baseline risk assessment to estimate the current and future effects of contaminants on human health and the environment. A baseline risk assessment is an analysis of the potential adverse human health and ecological effects of releases of hazardous substance from a site in the absence of any actions or controls to mitigate such releases, under current and future land uses. The baseline risk assessment includes a human health risk assessment and an ecological risk assessment.

### Human Health Risk Assessment

A four-step process is utilized for assessing site-related human health risks for a reasonable maximum exposure scenario:

1) *Hazard Identification* - identifies the contaminants of concern at the Site based on several factors such as toxicity, frequency of occurrence, and concentration.
2) *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.
3) *Toxicity Assessment* - determines the types of adverse health effects associated with chemical exposures, and the relationship between magnitude of exposure (dose) and severity of adverse effects (response).
4) *Risk Characterization* - summarizes and combines outputs of the exposure and toxicity assessments to provide a quantitative assessment of site-related risks.

Hazard Identification

EPA has promulgated requirements for the management of PCB wastes as directed by Toxic Substances Control Act (TSCA) , and these TSCA requirements are applicable to the management of PCB contamination at this Site. These requirements provide a risk-based approach for managing PCB wastes. Consistent with this risk-based approach and Superfund risk assessment guidance, EPA conducted a baseline human health risk assessment (BHHRA), as part of the RI/FS, for residential, commercial, and municipal properties in the vicinity of the CDE facility to determine the current and future effects of PCBs on human health.

For known or suspected carcinogens, EPA has established an acceptable cancer risk range of one-in-a million ($1 \text{ X } 10^{-6}$) to one-in-ten thousand ($1 \text{ X } 10^{-4}$). Action is generally warranted when excess lifetime cancer risk exceeds one-in-ten thousand. In other words, for every 10,000 people exposed under the assumptions used in the risk assessment, one additional cancer may occur as a result of exposure to the PCB-contaminated soils.

PCBs were identified as the contaminant of concern for the OU1 properties. The Aroclors detected at the properties in the vicinity of the CDE facility are Aroclor-1254 and Aroclor-1260. The range of detected concentrations for the chemicals of concern (COC) and frequency of detection (i.e., the number of times the chemical was detected in the samples collected) for the four properties where elevated levels were found and for the right-of-ways sampled during the RI are presented in Appendix II, Table 2. Table 2 also presents the exposure point concentrations for PCBs at the individual properties in surface and subsurface soil (i.e., the concentration that will be used to estimate the exposure and risk from each COC in the soil). The 95% Upper Confidence Level (UCL) on the arithmetic mean was used as the EPC for Aroclor 1254 and 1260 for the majority of properties.

Exposure Assessment

Consistent with Superfund policy and guidance, the BHHRA is a baseline risk assessment and therefore assumes no remediation to control or mitigate hazardous substance releases and no institutional controls. Cancer risks and non-cancer hazard indices were calculated based on an estimate of the reasonable maximum exposure (RME) expected to occur under current and future conditions at the individual properties. The RME is defined as the highest exposure that is reasonably expected to occur at a site. EPA also estimated cancer risks and non-cancer hazard indices based on central tendency (CT), or average, exposures at the individual properties.

The CDE facility is bounded by residential, commercial, and municipal properties. Based on the identified current and potential future land uses, the current populations most likely to be at risk of exposure are residents and commercial/municipal workers. Residential land use is most often associated with the greatest exposures based on frequency and duration that could result from current and future ingestion and direct contact with contaminated surface and subsurface soil. Therefore, the baseline risk assessment focused on health effects under the residential land use scenario, even though there are residential, commercial, and municipal properties under

evaluation (Appendix II, Table 1). Evaluating a residential scenario was considered "reasonable maximum exposure," and therefore most protective of human health.

The baseline risk assessment focused on health effects for both young children (up to 6 years old) and adults, in a residential setting, that could result from current and future direct contact with contaminated soil, such as incidental ingestion and dermal contact. Surface soil, and subsurface soil were examined to determine the cancer risk and non-cancer health hazards associated with exposure to PCBs on each of the properties sampled. Standard default residential exposure assumptions were used in the exposure assessment. Risks associated with exposure to PCB-contaminated interior dust, while not specifically evaluated, would be expected to be equivalent to those associated with surface soil.

Toxicity Assessment

The toxicity assessment determines the types of adverse health effects associated with PCB exposures and the relationship between the magnitude of exposure (dose) and severity of adverse effects (response). PCBs have, been identified by EPA as a probable human (Group B2, or likely to cause cancer in humans) carcinogen. 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), are also associated with PCB exposure based on animal studies.

Toxicity data for the human health risk assessment were provided by the Integrated Risk Information System (IRIS) database. This information is presented in Appendix II, Table 3 (cancer toxicity data summary) and Table 4 (non-cancer toxicity data summary).

Risk Characterization

The baseline risk assessment estimates the potential risk and hazards to human health if no remedial action occurs. A more detailed discussion of the baseline risk assessment can be found in Section. 6 of the RI.

For 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. Excess lifetime cancer risk is calculated from the following equation:

**Risk = LADD x SF**

where: **Risk** = a unitless probability ($1 \times 10^{-4}$) of an individual's developing cancer

**LADD** = lifetime average daily dose averaged over 70 years (mg/kg-day)

**SF** = slope factor, expressed as (mg/kg-day)

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 conditions identified in the assessment. As stated in the NCP, the acceptable risk range for site-related exposures is $10^{-4}$ to $10^{-6}$.

Results of the risk assessment indicate that the cancer risk estimates for the young child residents were above the risk range at one property ($2 \times 10^{-4}$) . For the adult, the cancer risks did not exceed the risk range of $1 \times 10^{-4}$. This information is presented in Appendix II, Table 5. The CTE calculated risks are presented in Appendix II, Table 6.

The potential for noncarcinogenic effects is evaluated by comparing an exposure level over a chronic time period, such as a 30-year period of exposure or more, with a reference dose (RfD) derived for a similar exposure period. An RfD represents a level that an individual may be exposed to that is not expected to cause any deleterious health effect. The ratio of the exposure dose to the reference dose is called a hazard quotient (HQ). An HQ of less than or equal to 1 indicates that the exposure dose is less than or equal to the reference dose, and that noncarcinogenic health effects are unlikely to occur. The hazard index (HI) for an exposure pathway is generated by summing the HQs for all chemicals of concern for a singular pathway. An HI of less than or equal to 1 indicates that noncarcinogenic health effects are unlikely to occur. An HI of greater than 1 indicates the likelihood that site-related exposures may result in noncarcinogenic health effects.

The HQ is calculated as follows:

**HQ = CDI/RfD**

where: **HQ** = hazard quotient
**GDI** = chronic daily intake (mg/kg-day)
**RfD** = reference dose (mg/kg-day)

The GDI and the RfD will represent the same exposure period (i.e., chronic, subchronic, or acute).

In the evaluation of non-cancer human health hazards, EPA found that four properties exceeded EPA's target hazard index of 1. The hazard indices were 1.5, 2, 14, and 36 for a young child, and less than 1, less than 1, 2, and 4 for an adult, respectively, at the four individual properties. This information is presented in Appendix II, Table 7 and 8. These cancer risks and non-cancer hazards indicate that there is a potential cancer risk and non-cancer health hazard to young children and adults from direct exposure to contaminated surface and subsurface soil at these four properties. 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 surface and subsurface soils, as well as the toxicity of PCBs. As stated above, risks associated with exposure to PCB-contaminated

interior dust, while not specifically evaluated, would be expected to be equivalent to those associated with surface soil.

Based on these risk estimates driven by the presence of PCBs in soils, the response action selected in this ROD is necessary to protect human health or welfare or the environment from actual or threatened releases of hazardous substances into the environment.

Uncertainties

The procedures and inputs used to assess risks in this evaluation, as in all such assessments, are subject to a wide 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 significant 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.

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, as well as in the difficulties of 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 risks, including a quantitative evaluation of the degree of risk associated with various exposure pathways, is presented in the risk assessment report, which is part of the administrative record for the Site.

## Ecological Risk Assessment

A four-step process is utilized for assessing site-related ecological risks for a reasonable maximum exposure scenario:

1) *Problem Formulation* - a qualitative evaluation of contaminant release, migration, and fate; identification of contaminants of concern, receptors, exposure pathways, and known ecological effects of the contaminants; and selection of endpoints for further study.

2) *Exposure Assessment* - a quantitative evaluation of contaminant release, migration, and fate; characterization of exposure pathways and receptors; and measurement or estimation of exposure point concentrations.

3) *Ecological Effects Assessment* - literature reviews, field studies, and toxicity tests, linking contaminant concentrations to effects on ecological receptors.

4) *Risk Characterization* - measurement or estimation of both current and future adverse effects.

An ecological risk assessment (ERA) was performed for the surface soils at properties in the vicinity of the CDE facility. The objective of the ERA was to assess potential risks to terrestrial receptors from contaminants found on these properties. Based on the ERA, PCB-contaminated soils at these properties represent low potential risks to wildlife species, due to the lack of significant habitat at most of the properties. An ERA for the CDE facility and for surface water and associated wetlands is being conducted as part of the later operable units (OU2 and OU3) that include these elements.

## REMEDIAL ACTION OBJECTIVES

Remedial Action Objectives 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 following remedial action objectives for contaminated soil and indoor dust will address the human health risks and environmental concerns at residential, commercial, and municipal properties in the vicinity of the CDE facility:

reduce or eliminate the direct contact threat associated with contaminated soil and indoor dust to levels protective of current land use and considering the future residential use; and

prevent exposure and minimize disturbance to the surrounding community of South Plainfield, during implementation of the remedial action.

EPA is using 1 ppm as its Remediation Goal for this action. The State of New Jersey has developed a RDCSCC for PCBs of 0.49 ppm. Because this is not a promulgated standard, it is not an ARAR but rather a "To Be Considered" (TBC) criterion.

Based on the data collected to date, EPA believes that in meeting EPA's Remediation Goal for PCBs, the Selected Remedy may also achieve the State's RDCSCC. If the Selected Remedy does not achieve the RDCSCC at some properties, the State may elect to pursue additional soil removal, or may require that restrictions be placed on properties to prevent future direct contact with soils above 0.49 ppm.

Based upon investigations performed to date, four properties have been identified that would require remediation: three properties that were identified in the RI investigation, and one property that was identified during an earlier removal action investigation. This last property did not require an immediate response under EPA's removal action authority, but will be addressed under this final remedy. The locations of the four properties that would require remediation are identified in Appendix II, Figure 4. The properties include a single-family home, an automotive repair station, a construction company office, and a former day care center. EPA has conservatively estimated that, after additional sampling is performed on an estimated 59 properties (as discussed in the Summary of Site Characteristics Section, above) up to 12 additional properties (beyond the four already identified) may require remediation. In addition, a re-evaluation of the soil removal actions already conducted at 13 residential properties will be necessary, to insure that those actions satisfy the remedial action objectives established here.

Indoor dust remediation may also be required to meet the remedial action objectives, if PCB-contaminated dust is encountered in excess of EPA's Remediation Goal of 1 ppm for PCBs. The additional sampling described above will also evaluate indoor dust.

## DESCRIPTION OF REMEDIAL ALTERNATIVES

CERCLA requires 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, CERCLA includes a preference for the use of treatment as a principal element for the reduction of toxicity, mobility or volume of hazardous substances.

CERCLA requires that if a remedial action is selected that results in hazardous substances, pollutants, or contaminants remaining at a site above levels that allow for unlimited use and unrestricted exposure, EPA must review the action no less often than every five years after initiation of the action. In addition, institutional controls (e.g., a deed notice, an easement or a covenant) to limit the use of portions of the property may be required. These use restrictions are discussed in each alternative as appropriate. The type of restriction and enforceability will need to be determined after completion of the remedial alternative selected in the ROD. Consistent with expectations set out in the NCP,. none of the remedies rely exclusively on institutional controls to achieve protectiveness. The time frames below for construction do not include the time for remedial design or the time to procure contracts.

The remedial alternatives evaluated for OU1 were limited for several reasons. The affected properties are primarily located in a well-established residential neighborhood, and space is

limited; consequently, on-site remedies that involve treatment or containment (such as creating a disposal cell for the soil in the area) were not considered. In addition, since no principal threat wastes are associated with OU1 and the contaminant concentrations are relatively low, utilizing treatment of the contaminated soil as a principal element was not a focus of any of the alternatives developed for OU1.

The remedial alternatives require an investigation of additional properties in the study area, during the remedial design, to determine if additional properties require remediation. The additional sampling would typically be performed on properties where previous curbside sampling exceeded EPA' s Remediation Goal of 1 ppm and New Jersey's RDCSCC of 0.49 ppm. The sampling would include exterior soils and the collection of dust samples from the interior of homes. The sampling would be performed in accordance with NJDEP requirements, including the sampling protocols identified in N.J.A.C. 7:26E. Based on the investigations performed to date, EPA has targeted at least 59 properties where additional soil and interior dust sampling is called for. The active remedial alternatives also call for a re-evaluation of the 13 residential properties where removal actions have already been performed, to ensure that those cleanups are consistent with the remediation goals established for OU1.

The active remedial alternatives require an expanded Cultural Resources evaluation, including activities to complete a Stage IA investigation for OU1, and further work needed based on the results and recommendations of the Stage IA investigation. This work would be completed before any remedial actions are implemented for OU1.

Remedial alternatives for OU1 soils and indoor dust are presented below:

Alternative 1: No Action

| | |
|---|---|
| Capital Cost: | $0 |
| Annual Operation and Maintenance (O&M): | $0 |
| Present Worth: | $0 |
| Estimated Construction Time frame: | not applicable |

Superfund regulations require that the "No Action" alternative be evaluated at every site to establish a baseline for comparison with other remedial alternatives. Under the alternative, EPA would take no action at these properties to prevent exposure to the soil and indoor dust contamination, and the contaminated soil and indoor dust would be left in place. Because no action results in contaminated soil and indoor dust remaining in place above acceptable levels with no means of controls, a review of the Site at least every five years would be required.

Alternative 2: Limited Action; Engineering and Institutional Controls

| | |
|---|---|
| Capital Cost: | $520,000 |
| Annual Operation and Maintenance (O&M): | $20,000 |
| Present Worth: | $770,000 |
| Estimated Construction Time frame: | 3 to 6 months |

The Limited Action alternative would provide engineering and institutional controls to prevent exposure to PCB-contaminated soils. Capping would be performed to minimize exposure to PCB-contaminated soil. The areas to be capped for each property would limit exposure to PCBs at concentrations greater than 1 ppm. Controls would also include implementation of deed notices or restrictions to limit future use of the properties, implementation of public awareness programs, and five-year reviews to assess the need for future remedial actions.

Sealing or other engineering controls to prevent direct contact or inhalation of PCB-contaminated indoor dust is not feasible in a residential setting. Therefore, this alternative would include indoor dust remediation where PCB-contaminated dust is encountered above the Remediation Goal of 1 ppm. Temporary relocation of residents during the cleaning may be appropriate in some cases, where necessary to ensure the health or safety of residents, or to allow cleanup activities to proceed. The cleaning procedures to be employed would consist of: wiping down all horizontal exposed surfaces; vacuuming floors, drapes, upholstery, molding and window casings using HEPA vacuums; washing all tile, linoleum and wood floors; steam cleaning or replacing carpets and area rugs; cleaning heating and cooling ducts; and cleaning or replacing all filters on air handling equipment.

Post-cleaning indoor dust samples would be collected to determine the effectiveness of the . cleaning.

Because PCB-contaminated soil would be left in place as part of Alternative 2, review of the remedy every five years would be required.

Alternative 3: Excavation; Off-Site Disposal with Treatment

| | |
|---|---|
| Capital Cost: | $760,000 |
| Annual Operation and Maintenance (O&M): | $0 |
| Present Worth: | $760,000 |
| Estimated Construction Time frame: | 12 months |

This alternative includes the excavation of an estimated 2,100 cubic yards of PCB-contaminated soil and off-site disposal at a Resource Conservation and Recovery Act (RCRA) or TSCA regulated landfill, as appropriate, based on the concentrations of PCBs in the excavated soils. Under this alternative, PCB-contaminated soil found at properties in excess of the Remediation Goal would be excavated for off-site disposal. If necessary, in order to meet the requirements of the disposal facilities, treatment of the soil may be performed using any of the technologies identified in the Feasibility Study. Once excavation activities have been completed at each property, clean soil would be used as backfill.

For cost-estimating purposes, the FS conservatively assumed that 16 properties would require soil excavation (4 already identified, plus 12 identified through new investigations), and an estimated 2,100 cubic yards of contaminated soil would be excavated from properties requiring soil cleanup.

As described in Alternative 2, this alternative would also include indoor dust remediation where PCB-contaminated dust is encountered above the Remediation Goal, and temporary relocation of residents in some cases, if necessary to ensure the health or safety of residents, or to allow cleanup activities to proceed.

## COMPARATIVE ANALYSIS OF ALTERNATIVES

In selecting the remedies, EPA considered the factors set out in CERCLA Section 121, 42 U.S.C. § 9621, by conducting a detailed analysis of the viable remedial alternatives 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 alternatives against each of nine evaluation criteria and a comparative analysis focusing upon the relative performance of each alternative against those criteria.

***Threshold Criteria*** *- The first two criteria are known as " threshold criteria" because they are the minimum requirements that each response measure must meet in order to be eligible for selection as a remedy.*

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

Overall protection of human health and the environment addresses whether or not a remedy provides adequate protection and describes how risks posed through each exposure pathway (based on a reasonable maximum exposure scenario) are eliminated, reduced, or controlled through treatment, engineering controls, or institutional controls.

Alternative 1, the no action alternative, is not protective of human health and the environment because it does not eliminate, reduce, or control risk of exposure to PCBs in soil or indoor dust through off-site disposal, treatment/engineering controls, and/or institutional controls.

Alternative 2 would provide some protection to property owners/occupants from future exposure to contaminated soils and indoor dust, through the placement of cover material over PCB-contaminated soils, through indoor dust remediation where necessary, and through institutional controls such as land use restrictions and public education. However, contaminated soils would remain in place above the Remediation Goal.

Alternative 3, excavation and off-site disposal, would remove soil and indoor dust with PCB concentrations above the Remediation Goal and, therefore, would protect both human and environmental receptors from contact with contaminants in the soil and, for human receptors, indoor dust.

There would be no local human health or environmental impacts associated with off-site disposal because the contaminants would be removed from the Site to a secure location. Alternative 3 would eliminate the actual or potential exposure of residents to contaminated soils and/or indoor dust.

**2. Compliance with applicable or relevant and appropriate requirements (ARARs)**
Section 121 (d) of CERCLA, 42 U.S.C. § 9621 (d) , and 40 CFR § 300.430 (f) (1) (ii) (B) require that remedial actions at CERCLA sites at least attain legally applicable or relevant and appropriate Federal laws and State environmental or facility siting laws, collectively referred to as "ARARs", unless such ARARs are waived under CERCLA Section 121 (d) (4).

Applicable requirements are those cleanup standards, standards of control, and other substantive requirements, criteria, or limitations promulgated under Federal environmental or State environmental or facility siting laws that specifically address a hazardous substance, pollutant, contaminant, remedial action, location, or other circumstance found at a CERCLA site. Only those State standards that are identified by a state in a timely manner and that are more stringent than Federal requirements may be applicable. Relevant and appropriate requirements are those cleanup standards, standards of control, and other substantive requirements, criteria, or limitations promulgated under Federal environmental or State environmental or facility siting laws that, while not "applicable" to a hazardous substance, pollutant, contaminant, remedial action, location, or other circumstance at a CERCLA site, address problems or situations sufficiently similar to those encountered at the CERCLA site that their use is well-suited to the particular site. Only those State standards that are identified in a timely manner and are more stringent than Federal requirements may be relevant and appropriate.

Compliance with ARARs addresses whether a remedy will meet all of the applicable or relevant and appropriate requirements of other Federal and State environmental statutes or provides a basis for a invoking waiver.

Alternative 1 Since action-specific ARARs apply to actions taken, they are not applicable to the no action alternative. EPA has determined that there are no chemical-specific or location-specific ARARs for GUI.

Alternatives 2 and 3 would comply with action-specific ARARs. Among the major ARARs applicable to the remedial action for OU1, RCRA and TSCA are federal laws that mandate procedures for managing, treating, transporting, storing, and disposing of hazardous substances. All portions of RCRA and TSCA that are applicable or relevant and appropriate to an GUI response action would be met by Alternatives 2 and 3.

There are no chemical-specific ARARs for the contaminated soils. EPA has selected a Remediation Goal of 1 ppm for use in Alternatives 2 and 3. The State of New Jersey has developed a residential soil cleanup criterion for PCBs of 0.49 ppm, which is a TBC criterion. On properties where the State criterion is not achieved, NJDEP may elect to take additional actions to meet its more stringent criterion.

Alternatives 2 and 3 require an expanded Cultural Resources evaluation, including activities to complete a Stage IA investigation for OU1, and further work needed based on the results and recommendations of the Stage IA investigation. This work would be completed before any remedial actions are implemented for OU1.

***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 Permanence**

Long-term effectiveness and permanence refers to the ability of a remedy to maintain reliable protection of human health and the environment over time, once cleanup goals have been met. It also addresses the magnitude and effectiveness of the measures that may be required to manage the risk posed by treatment residuals and/or untreated wastes.

Alternative 1 offers no long-term effectiveness and permanence.

Alternative 2 would not be permanent or as effective over the long term, since contaminated soil would remain at the Site with concentrations above the Remediation Goal, and institutional controls might not reliably reduce future health risks to property owners and/or occupants associated with exposure to contaminated surface soils.

With Alternative 3, long-term risks would be removed, since contaminated soils and indoor dust would be permanently removed. Off-site treatment, where necessary, and disposal at a secure, permitted hazardous waste facility for the contaminated soil is reliable because the design of such facilities includes safeguards and would ensure the reliability of the technology and the security of the waste material.

**4. Reduction of Toxicity, Mobility, or Volume of Contaminants through Treatment**

Reduction of toxicity, mobility, or volume through treatment refers to a remedial technology's expected ability to reduce the toxicity, mobility, or volume of hazardous substances, pollutants or contaminants at the site.

Alternative 1 would not reduce the toxicity, mobility or volume of contaminated soil or indoor dust, since the soil and indoor dust would remain in place.

Alternative 2 would reduce the mobility of the soil contaminants through capping, but would not reduce the volume or toxicity. Alternative 2 would reduce the mobility and volume of dust through indoor dust remediation where PCB-contaminated dust is encountered.

Alternative 3 would reduce contaminant mobility through removal and disposal of the soils at an approved off-site disposal facility. Furthermore, off-site treatment, when required, would reduce the toxicity and volume of the contaminated soils prior to land disposal. Soils with PCB concentrations less than 50 ppm would be excavated and transported to a RCRA landfill permitted to accept low levels of PCB waste. Soils with PCB concentrations between 50 and 500 ppm would be excavated and transported to a TSCA landfill without treatment. It is anticipated that hazardous material would not be destroyed under Alternative 3, unless the disposal facility required treatment prior to landfilling.

Alternative 3, like Alternative 2, would reduce the mobility and volume of dust through indoor dust remediation where PCB-contaminated dust is encountered.

**5. Short-term Effectiveness**

Short-term effectiveness addresses short-term risks to the community, workers and the environment during the construction and implementation of the remedial alternatives, and the effectiveness and reliability of protective and mitigative measures.

Alternative 1, the no action alternative, poses no short-term risks.

Alternative 2 would be completed in approximately three to six months. Minimal impacts would be expected for Alternative 2 since contaminated soils would not be significantly disturbed during cap construction.

Alternative 3 presents a higher short-term risk because of the greater potential for exposure associated with excavation and transportation of contaminated soils. Alternative 3 would also cause an increase in truck traffic, noise and potentially dust in the surrounding community, as well as potential impacts to workers during the performance of the work. These potential impacts would be created through construction activities and exposure to the contaminated soil being excavated and handled. However, proven protective and mitigative procedures including engineering controls, personal protective equipment and safe work practices would be used to address potential impacts to workers and the community. For example, the work would be scheduled to coincide with normal working hours (e.g., 8 a.m. to 5 p.m. on week days and no work on weekends or holidays). In addition, trucking routes with the least disruption to the surrounding community would be utilized. Appropriate transportation safety measures would be required during the shipping of the contaminated soil to the off-site disposal facility.

The risk of release during implementation of Alternatives 2 and 3 is principally limited to wind-blown soil transport or surface water run-off. Any potential environmental impacts associated with dust and runoff would be minimized by proper installation and implementation of dust and erosion control measures and by performing the excavation and off-site disposal with appropriate health and safety measures to limit the amount of material that may migrate to a potential receptor.

For both Alternative 2 and Alternative 3, short-term effectiveness during the indoor dust remediation would be provided by temporary relocation of affected residents when and if EPA determines it to be necessary to ensure the health or safety of residents or when it is needed to physically allow cleanup activities to be conducted.

Alternative 3 is estimated to take about 12 months to implement. This schedule does not take into account the performance of the additional property investigations, to identify other contaminated properties, which would be required under Alternative 2 and Alternative 3. These investigations would be performed during remedial design, and could add up to one year to the typical remedial design time frame of 15 to 18 months; however, the additional investigative

work can be performed concurrently with remediation of the known contaminated properties to streamline the schedule.

**6. Implementabi1ity**

Implementability addresses the technical and administrative feasibility of a remedy from design through construction and operation. Factors such as availability of services and materials, administrative feasibility, and coordination with other governmental entities are considered.

Alternative 1 requires no implementation.

Alternatives 2 and 3 can be implemented using conventional equipment and services that are readily available. The personnel required to operate the heavy equipment would require appropriate Occupational Safety and Health Administration (OSHA) certifications (e.g., hazardous waste worker), in addition to being certified in the operation of heavy equipment. Such individuals are readily available. Off-site hazardous and non-hazardous treatment/disposal facilities for the disposal of the contaminated soils are available, so disposal would be feasible.

Alternative 2 would, however, require the imposition of engineering and institutional controls to ensure adequate protection of human health and the environment. The development of protective engineering and institutional controls that would be permanent, enforceable and acceptable to the private property owners cannot be assured.

**7. Cost**

Includes estimated capital and operation and maintenance costs, and net present-worth values.

The cost of Alternative 1 is $0.

The estimated present worth cost of Alternative 2 is $770,000, which includes operational and maintenance costs over a 30-year period.

The estimated present worth cost of Alternative 3 is $760,000.

***Modifying Criteria*** *- The final two evaluating criteria, criteria 8 and 9, are called "modifying criteria" because new information or comments from the state or the community on the Proposed Plan may lead to modification of the preferred response measure or cause another response measure to be considered.*

**8. State Acceptance**

State acceptance indicates whether, based on its review of the RI/FS reports and the Proposed Plan, the state supports, opposes, and/or has identified any reservations with the selected response measure.

The State of New Jersey does not concur with EPA's Remediation Goal of 1 ppm. However, the State of New Jersey otherwise agrees with the actions to be taken under the selected remedy.

**9. Community Acceptance**

Community acceptance summarizes the public's general response to the response measures described in the Proposed Plan and the RI/FS reports. 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 alternatives proposed for OU1 at the Cornell-Dubilier Electronics Site. The attached Responsiveness Summary addresses the comments received during the public comment period. The community was generally supportive of EPA's Proposed Plan.

## PRINCIPAL THREAT WASTE

EPA's findings to date indicate the presence of "principal threat" wastes at the former CDE facility property to be addressed in OU2, but no principal threat wastes were identified at the OU1 residential, commercial, and municipal properties. 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.

### SELECTED REMEDY

Based upon consideration of the results of the site investigations, the requirements of CERCLA, the detailed analysis of the response measures, and public comments, EPA has determined that Alternative 3 is the appropriate remedy for the Site, because it best satisfies the requirements of CERCLA Section 121 and the NCP's nine evaluation criteria for remedial alternatives, 40 CFR § 300.430(e)(9). The major components of the Selected Remedy include:

- excavation of an estimated 2,100 cubic yards of contaminated soil from approximately 16 properties, backfilling with clean fill, and property restoration as necessary;
- transportation of the contaminated soil off the site for disposal, with treatment as necessary;
- indoor dust remediation where PCB-contaminated dust is encountered; and,
- where necessary, temporary relocation of residents during the indoor remediation.

EPA's studies to date have identified four properties where actions need to be taken, and a study area of approximately 59 properties that require expanded soil and interior dust sampling to determine if additional properties require remediation. EPA has estimated that this expanded investigation may identify as many as 12 additional properties, and the Selected Remedy takes into account the likelihood that some of these properties will require some degree of remedial response. The Selected Remedy will be the final remedy for properties in the vicinity of the CDE

Site. In addition to these newly-identified properties, the Selected Remedy requires a re-evaluation of the 13 residential properties where soil removal actions have already been performed, to insure that those cleanups are consistent with the remediation goals established for OU1.

In addition, dust samples will be collected from the interior of homes, and where PCB-contaminated dust is encountered at levels in excess of EPA's Remediation Goal of 1 ppm, indoor dust remediation will be performed. Post-cleaning indoor dust samples will be collected to determine the effectiveness of the remediation.

Where necessary to ensure the health or safety of residents, or to allow cleanup activities to proceed, temporary relocation of residents may be required. Temporary relocation is more likely at properties requiring indoor dust remediation.

The estimated cost of Alternative 3 is $760,000. A summary of the estimated remedy costs is included in Appendix II, Table 9 and 10. The information in the cost estimate summary table is based on the best available information regarding the anticipated scope of the remedial alternatives. 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 alternatives. Major changes may be documented in the form of a memorandum in the Administrative Record file, an Explanation of Significant Differences, or a ROD amendment.

The Selected Remedy will require the completion of a Stage IA Cultural Resources investigation, and may require mitigation depending upon the results of that investigation.

The selection of Alternative 3 is believed to provide the best balance of trade-offs among the alternatives with respect to the evaluation criteria. EPA and NJDEP believe the selected alternative will be protective of human health and the environment, complies with Federal and State requirements that are legally applicable or relevant and appropriate to the remedial action, is cost-effective, and will utilize permanent solutions and treatment technologies to the maximum extent practicable. Based on the sampling performed to date, the contaminated soil will not require treatment to meet the requirements of off-site disposal facilities. Therefore, Alternative 3 would not meet the statutory preference for the use of remedies that employ treatment that reduces toxicity, mobility or volume as a principal element.

## STATUTORY DETERMINATIONS

As was previously noted, CERCLA Section 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. CERCLA Section 121 (b) (1) also establishes a preference for remedial actions that employ treatment to permanently and significantly reduce the volume, toxicity, or mobility of the hazardous substances, pollutants, or contaminants at a site. CERCLA Section 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 Section 121(d)(4). For the reasons discussed below, EPA has determined that the selected remedy meets the requirements of CERCLA Section 121.

## Protection of Human Health and the Environment

The Selected Remedy, Alternative 3, will adequately protect human health and the environment through off-site treatment, if necessary, and disposal. The Selected Remedy will eliminate all significant direct-contact risks to human health and the environment associated with contaminated soil and indoor dust on the OU1 properties. This action will result in the reduction of exposure levels to acceptable risk levels within EPA's generally acceptable risk range of $10^{-4}$ to $10^{-6}$ for carcinogens and below a HI of 1.0 for noncarcinogens. Implementation of the Selected Remedy will not pose unacceptable short-term risks or adverse cross-media impacts.

## Compliance with ARARs

At the completion of the response action for the PCB-contaminated properties, the Selected Remedy will meet the standards of all applicable ARARs, including:

Action-Specific ARARs:

Compliance with action-specific ARARs will be achieved by conducting all remedial action activities in accordance with the following:

- TSCA - Requirements codified at 40 CFR § 761.61 provide a risk-based approach for managing PCB wastes.

- TSCA - Requirements codified at 40 CFR § 761.65 govern storage for disposal of PCB waste with concentrations of 50 ppm or greater.

- TSCA - Requirements codified at 40 CFR § 761.79 set decontamination standards for equipment and personal protective equipment.

- RCRA - Requirements codified at 40 CFR Part 262 govern packaging, labeling, manifesting and storage of hazardous waste.

- RCRA - Requirements codified at 40 CFR Part 263 govern off-site transport of hazardous waste.

- RCRA - Requirements codified at 40 CFR Part 264 govern on-site storage of hazardous waste.

- RCRA - Land Disposal Restrictions. Land disposal restrictions (LDRs), codified at 40 CFR Part 268, prohibit land disposal of soils exhibiting the toxicity characteristic because

of the presence of metals and containing PCBs, unless total PCBs are less than 1,000 ppm and the soils meet specified treatment standards.

- Hazardous Materials Transportation Law, 49 U. S. C. § 5101 et seq. Hazardous wastes that are transported off-site must meet Department of Transportation regulations set forth in 49 CFR Parts 105, 107, 171-178.

- Clean Water Act (CWA) - Section 402 of the CWA, 33 U.S.C. § 1342, and its regulations codified at 40 CFR Part 122, govern discharge of stormwater from construction sites of more than one acre.

- New Jersey Hazardous Waste Management Regulations - Requirements codified at N.J.A.C. 7:26G establish standards for generation, accumulation, on-site management, and transportation of hazardous wastes.

- NJDEP Technical Requirements for Site Remediation. These requirements, codified at N.J.A.C. 7:26E, specify technical standards to be followed at sites undergoing remediation pursuant to New Jersey remediation programs.

- New Jersey Air Quality Regulations - Requirements codified at N.J.A.C. 7:27 are applicable to the generation and emission of air pollutants.

- National Historic Preservation Act - Pursuant to Section 106 of the National Historic Preservation Act, potentially significant cultural resources at the Site must be identified.

Chemical-Specific ARARs:

- None applicable.

Location-Specific ARARs:

- None applicable.

To Be Considered Material (TBCs). The following requirements will be considered by EPA during design and implementation of the Selected Remedy, and will be complied with the extent practicable.

- NJDEP Guidance for Remediation of Contaminated Soils. NJDEP has developed a residential direct contact soil cleanup . criterion of 0.49 ppm for PCB-contaminated soil. While EPA has selected a Remediation Goal of 1.0 ppm for the OU1 properties, EPA believes that the selected remedy may achieve the NJDEP criterion. On properties where the NJDEP criterion is not attained, NJDEP may elect to take additional actions to meet its more stringent guideline.

- NJDEP standards for soil erosion and sediment control, N.J.A.C. 2:90-1.1, describes the recommended approach and standards to be used for soil erosion and sediment control plans.

Other Pertinent Requirements

- Occupational Safety and Health Act (OSHA) - Occupational Safety and Health Standards for Hazardous Response and General Construction Activities (29 CFR Parts 1904, 1910, 1926) are intended to protect workers from harm related to occupational exposure to chemical contaminants, physical hazards, heat or cold stresses, noise, etc. OSHA is considered to be a "non-environmental law" whose standards and requirements apply of their own force, not as a result of the CERCLA ARAR system (55 FR 8680, March 8, 1990). For this reason, remediation activities at the Site will be subject to the requirements of OSHA.

- EPA guidance document, "Superfund Response Actions: Temporary Relocations Implementation Guidance" provides guidance to EPA concerning implementation of temporary relocation activities when necessary.

A comprehensive list of ARARs and TBCs (e.g., advisories, criteria, and guidance) is provided in the Final Feasibility Study Report for OU1, Table 3-1.

## Cost-Effectiveness

In EPA's judgment, the Selected Remedy is cost effective and represents reasonable value for the money to be spent. 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 to costs to determine cost-effectiveness. The overall effectiveness of the Selected Remedy has been determined to be proportional to the costs, and the Selected Remedy therefore represents reasonable value for the money to be spent.

The estimated present worth of the Selected Remedy for OU1 is $760,000, whereas the estimated present worth of Alternative 2 is $770,000. Alternative 3 thus is both less expensive and significantly more protective of human health and the environment than Alternative 2, necessarily making it the most cost-effective alternative.

## Utilization of Permanent Solutions and Alternative Treatment Technologies to the Maximum Extent Practicable

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.

As between Alternatives 2 and 3, the alternatives that are protective of human health and the environment and comply with ARARs, EPA has determined that Alternative 3 provides the better balance of trade-offs with respect to the five balancing criteria.

The Selected Remedy satisfies the criteria for long-term effectiveness and permanence by removing PCBs from soil and indoor dust. The Selected Remedy presents a higher short-term risk than Alternative 2 because of the greater potential for exposure associated with excavation and transportation of contaminated soils. However, these short-term risks will be mitigated through implementation of measures such as engineering controls, use of personal protective equipment, safe work practices and perimeter air monitoring.

The Selected Remedy is implementable since it employs standard technologies that are readily available. In contrast, implementation of sufficiently protective engineering and institutional controls, as required in Alternative 2, would require the cooperation of the property owners, which cannot be assured. Moreover, engineering and institutional controls would reduce, but not eliminate the possibility that contaminated soils could be disturbed and redistributed, leading to exposure to PCBs and associated health and environmental risks.

### Preference for Treatment as a Principal Element

Based on the sampling performed to date, the contaminated soil will not require treatment to meet the requirements of off-site disposal facilities. The Selected Remedy does not meet the statutory preference for the use of remedies that employ treatment that reduces toxicity, mobility or volume as a principal element.

### Five-Year Review Requirements

Because this remedy will not result in hazardous substances, pollutants, or contaminants remaining on the OU1 properties above levels that allow for unlimited use and unrestricted exposure, it will not be necessary to perform a statutory review within five years after initiation of the remedial actions to ensure that the remedies are, or will be, protective of human health and the environment.

## DOCUMENTATION OF SIGNIFICANT CHANGES

The Proposed Plan for the Cornell-Dubilier Electronics site was released for public comment on June 16, 2003. The comment period closed on July 16, 2003.

The text of the proposed plan did not include language regarding the need to perform additional Cultural Resources work pursuant to the recommendations of the Stage IA Cultural Resources survey performed for the Site. The Selected Remedy will require additional Cultural Resources work, including additional Stage IA-related activities for GUI and further work needed based on the results and recommendations of the additional Stage IA-related activities. This work will be completed during the remedial design for OU1 and before any remedial actions are implemented for OU1.

The text of the proposed plan stated that the hazard indices for the three properties identified in the RI investigation were 56, 2.8, and 2.4 for the young child and 6.1, less than 1, and less than 1 for the adult at the individual properties. The correct hazard indices are 36, 14, and 2 for the young child and 4, 2, and less than 1 for the adult. Furthermore, the text of the proposed plan did not include the hazard indices for the one property that was identified during the earlier removal action investigation, but would be addressed under this final remedy. At this property, the hazard indices were 1.5 for the young child and less than 1 for the adult.

All written and verbal comments submitted during the public comment period were reviewed by EPA. Upon review of these comments, it was determined that no significant changes to the remedy, as it was originally identified in the Proposed Plan, were necessary.

# APPENDIX I

# FIGURES

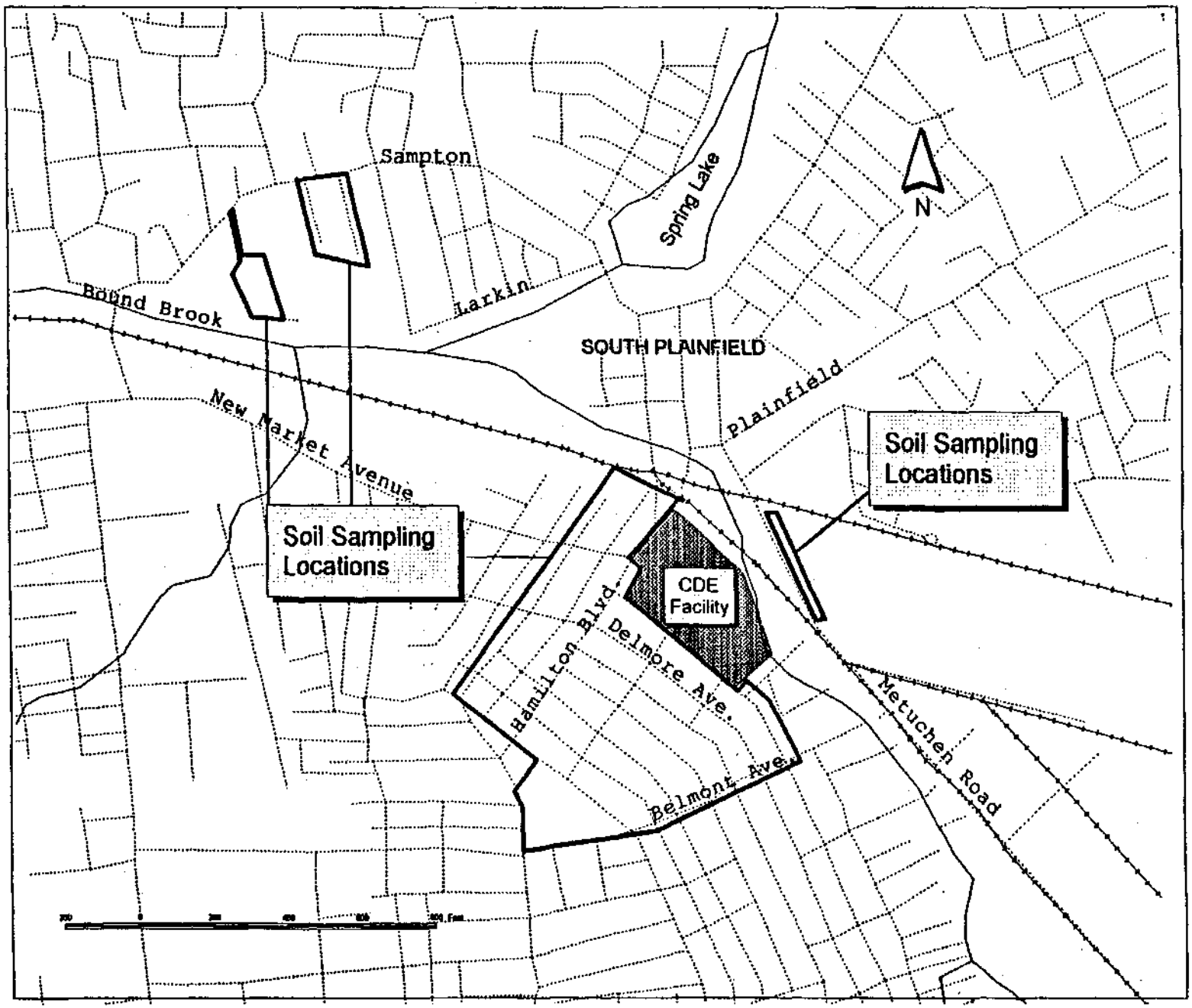
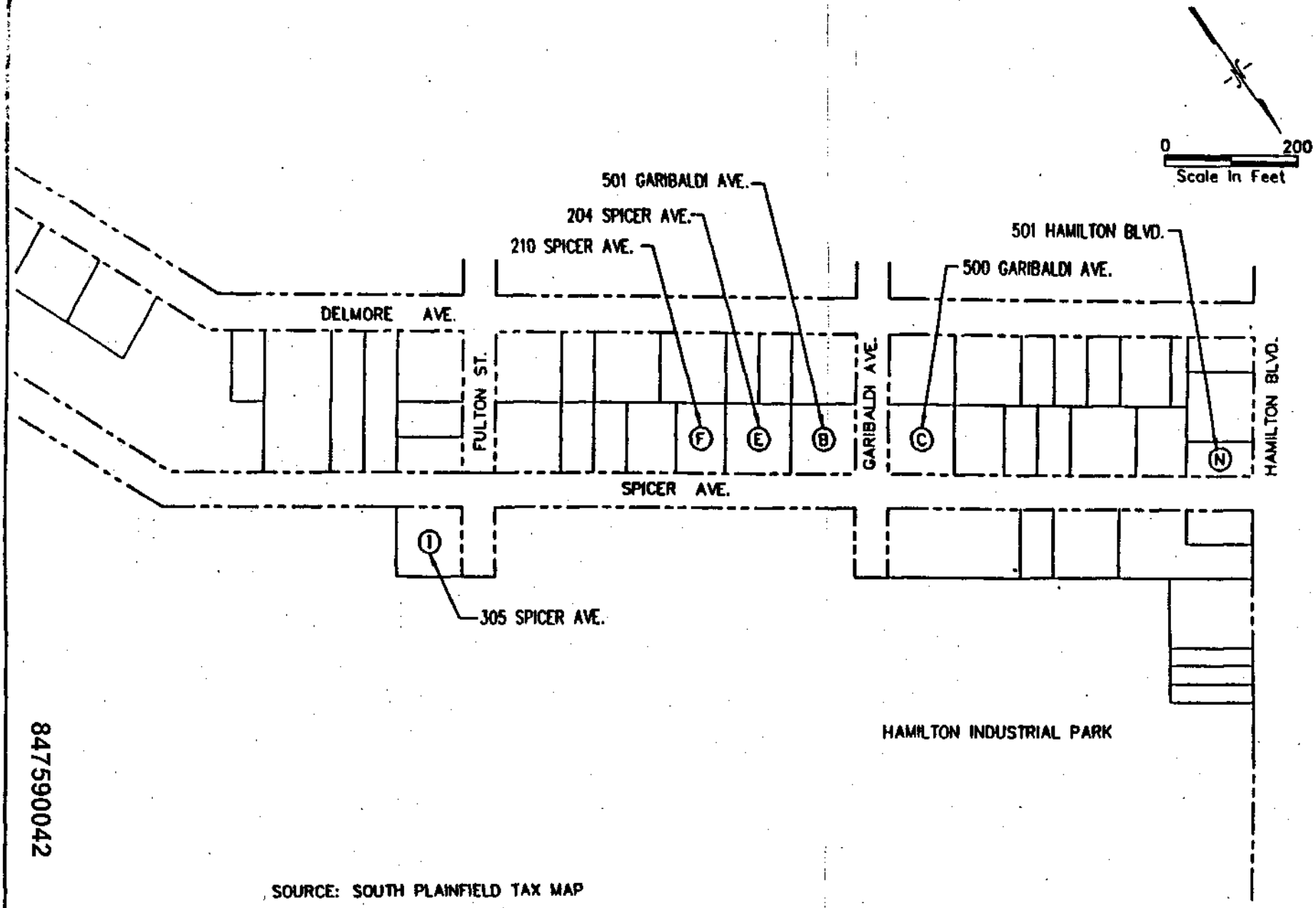



Figure 1
Cornell-Dubilier Electronics Site
Residential, Commercial, and Municipal Sampling Locations



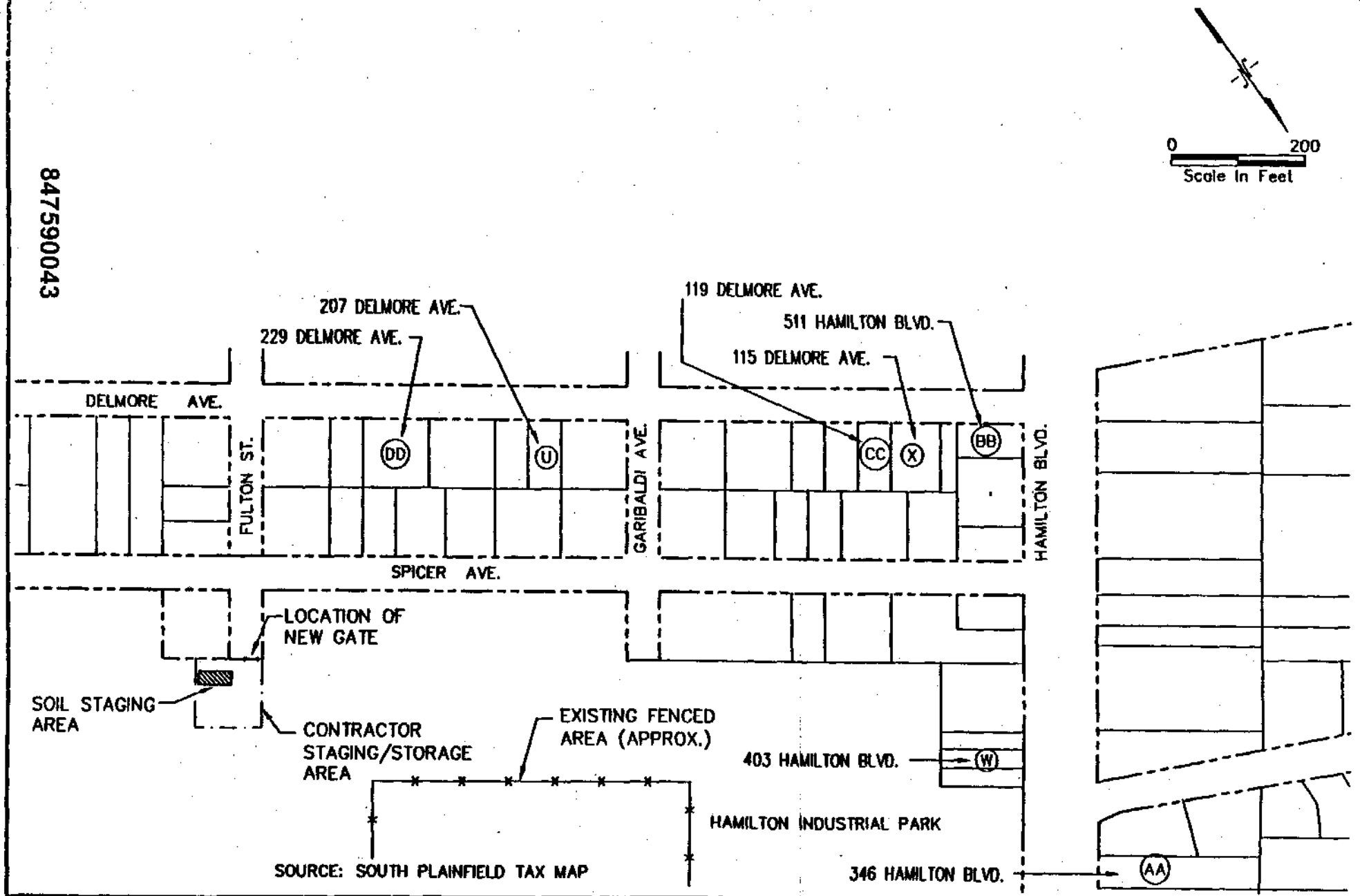

847590042

SOURCE: SOUTH PLAINFIELD TAX MAP

PROPERTY LOCATION MAP
RESIDENTIAL SITES–HAMILTON INDUSTRIAL PARK
SOUTH PLAINFIELD, NEW JERSEY

Figure 2

847590043




# PROPERTY LOCATION MAP

TIER II RESIDENTIAL SITES

SOUTH PLAINFIELD, NEW JERSEY

Figure 3

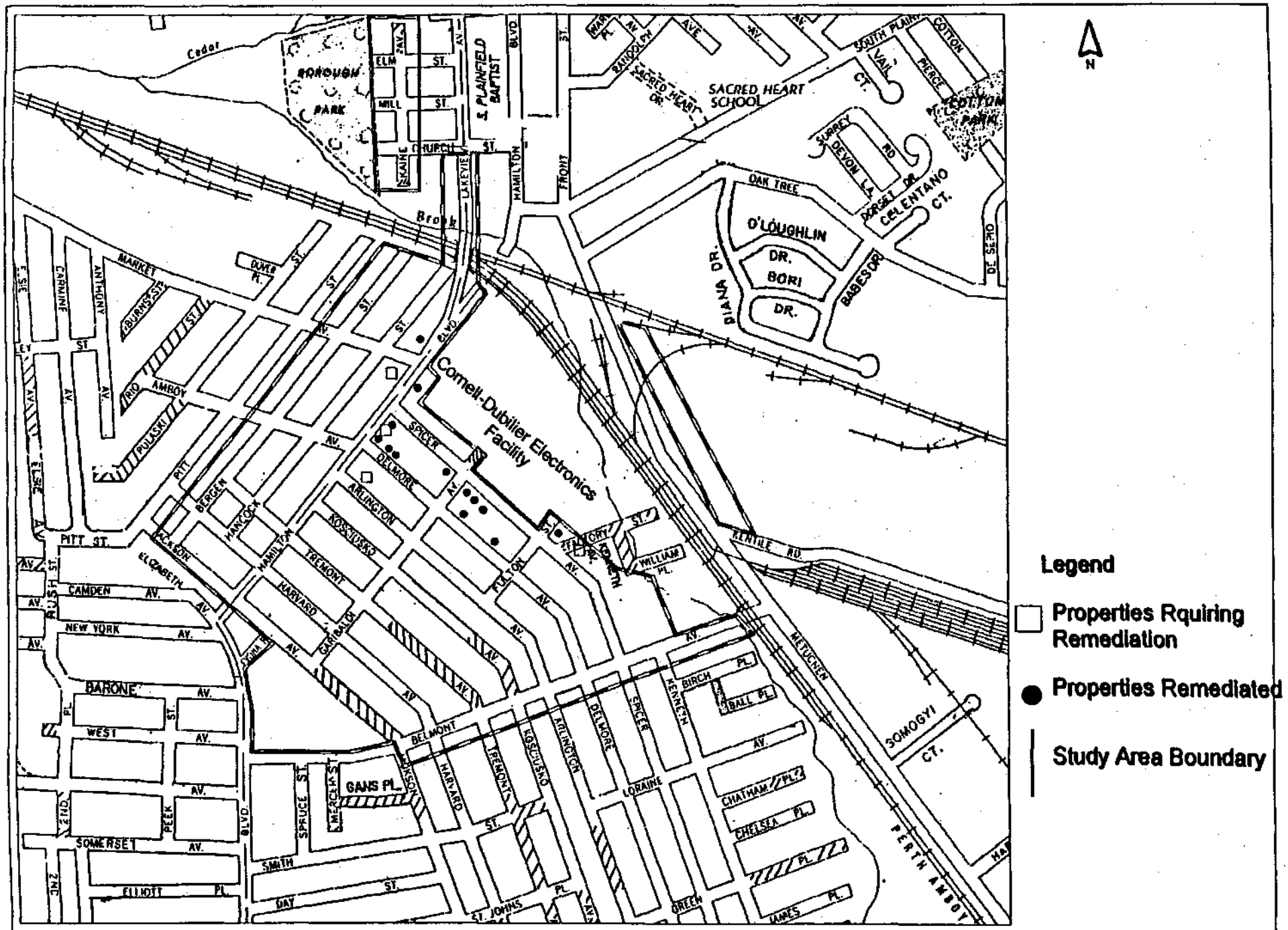



**Figure 4**
Cornell-Dubilier Electronics Site
Study Area

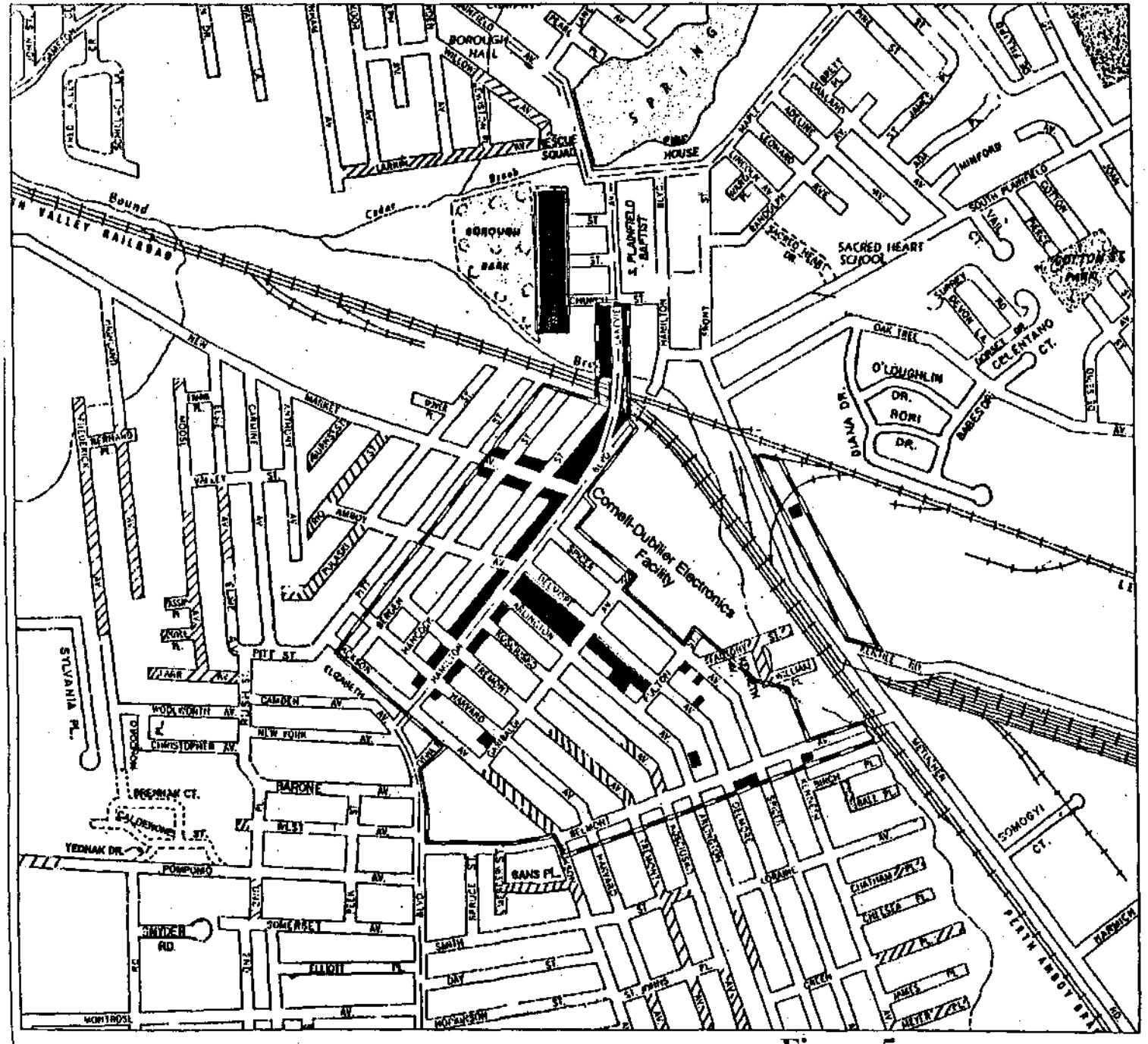



**Figure 5**
Cornell-Dubilier Electronics Site
Area Requiring Additional Sampling

# APPENDIX II

# TABLES

Table 1. Conceptual Site Model for Residential Properties.

| Scenario/ Timeframe | Medium | Exposure Medium | Exposure Point | Receptor Population | Receptor Age | Exposure Route | On-Site/ Off-Site | Type of Analysis | Rationale for Selection or Exclusion of Exposure Pathway |
|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | | | |
| Current/ Future | Soil | Surface Soil | Surface Soil | Resident | Adult | Ingestion | Off-Site | Quant. | Currently in use as residential, commercial, or municipal property, and residential use is considered an reasonable maximum exposure. |
| | | | | | | Dermal Contact | Off-Site | Quant. | Currently in use as residential, commercial or municipal property, and residential use is considered an reasonable maximum exposure. |
| | | | | Resident | Child | Ingestion | Off-Site | Quant. | Currently in use as residential, commercial, or municipal property, and residential use is considered an reasonable maximum exposure. |
| | | | | | | Dermal Contact | Off-Site | Quant. | Currently in use as residential, commercial, or municipal property, and residential use is considered an reasonable maximum exposure. |

Table 2. Summary of Chemicals of Concern and Medium Specific Exposure Point Concentrations (EPCs).

| Scenario Timeframe: | Current | | | | | | |
|---|---|---|---|---|---|---|---|
| Medium: | Surface Soil | | | | | | |
| Exposure Medium: | Surface Soil | | | | | | |
| Exposure Point (Property Number) | Chemical of Concern | Concentration Detected Min. | Max. | Units | Frequency of Detection | Exposure Point Concentration | Exposure Point Concentration Units | Statistical Measure |
| 1 | Aroclor - 1254 | 0.014 | 6.1 | mg/kg | 19/20 | 2.3 | mg/kg | 95% UCL-C (Chebychev Inequality Test) |
| 13 | Aroclor - 1254 | 0.033 | 0.28 | mg/kg | 8/20 | 0.41 | mg/kg | 95% UCL-C |
| 13 | Aroclor-1260 | 0.031 | 44 | mg/kg | 7/20 | 16.0 | mg/kg | 95% UCL-C |
| 18 | Aroclor - 1254 | 0.063 | 270 | mg/kg | 22/23 | 41 | mg/kg | 99% UCL-C |
| D | Aroclor-1254 | 0.09 | 2.8 | mg/kg | 16/18 | 0.83 | mg/kg | 95% UCL-T |
| D | Aroclor-1260 | 0.11 | 2.2 | mg/kg | 16/18 | 0.80 | mg/kg | 95% UCL-T |

Table 3. Cancer Toxicity Data Summary

| Chemical of Concern | Oral Cancer Slope Factor | Dermal Cancer Slope Factor | Slope Factor Units | Weight of Evidence Cancer Guidelines Description | Source | Date (mm/dd/yy) |
|---|---|---|---|---|---|---|
| Pathways: Ingestion, Dermal | | | | | | |
| Polychlorinated Biphenyls (RME) | 2.0 | 2.0 | $(mg/kg\text{-}day)^{-1}$ | B2 (likely) | IRIS | 5/21/01 |
| Polychlorinated Biphenyls (CTE) | 1.0 | 1.0 | $(mg/kg\text{-}day)^{-1}$ | B2 (likely) | IRIS | 5/21/01 |

IRIS = Integrated Risk Information System (USEPA).

(1) The B2 designation specifies a probable human carcinogen indicating there is sufficient evidence in animals and either inadequate or inadequate but suggestive evidence in humans.

Table 4. Non-Cancer Toxicity Data Summary.

| Chemical of Concern | Chronic/ Subchronic | Oral RfD | Oral RfD Units | Dermal RfD | Dermal RfD Units | Primary Target Organ | Combined Uncertainty/ Modifying Factors | Sources of RfD: Target Organ (1) | Dates of RfD Target Organ (mm/dd/yy) |
|---|---|---|---|---|---|---|---|---|---|
| Pathways: Ingestion, Dermal | | | | | | | | | |
| Aroclor 1254 | Chronic | 2.0 E-05 | $(mg/kg\text{-}day)^{-1}$ | 2.0 E-05 | $(mg/kg\text{-}day)^{-1}$ | Immune System/ Eye Gland | 300 | IRIS | 05/22/01 |

IRIS = Integrated Risk Information System (USEPA).

Oral RfD for Aroclor 1254 used; there is no RfD available for Aroclor 1260 and total PCBs. The PCBs in the residences are most like Aroclor 1254.

Table 5. Risk Characterization Summary for RME Exposures Individual Properties That Will Be Remediated.

Scenario Timeframe: Current/Future
Receptor Population: Child
Receptor Age: 0 to 6 Years Old

| Medium and Property | Exposure Medium | Chemical of Concern | Ingestion | Inhalation | Dermal | External Radiation | Exposure Routes Total |
|---|---|---|---|---|---|---|---|
| Surface Soil - 1 | Surface Soil | Aroclor 1254 | 5.0 E-06 | - | 2.0 E-06 | NA | 7 E-06 |
| Surface Soil - 13 | Surface Soil | Aroclor 1254 + Aroclor 1260 | 3.5 E-05 | - | 1.4 E-05 | NA | 5 E-05 |
| Surface Soil - 18 | Surface Soil | Aroclor 1254 | 9.0 E-05 | - | 3.5 E-05 | NA | 1 E-04 |
| Surface Soil - D | Surface Soil | Aroclor 1254 + Aroclor 1260 | 3.6 E-06 | - | 1.4 E-06 | NA | 5 E-06 |

Table 5 - Continued.

Scenario Timeframe: Current/Future
Receptor Population: Adult
Receptor Age: 19 Years or Older

| Medium and Property | Exposure Medium | Chemical of Concern | Ingestion | Inhalation | Dermal | External Radiation | Exposure Routes Total |
|---|---|---|---|---|---|---|---|
| Surface Soil - 01 | Surface Soil | Aroclor 1254 | 2.2 E-06 | - | 1.2 E-06 | NA | 3 E-06 |
| Surface Soil - 13 | Surface Soil | Aroclor 1254 + Aroclor 1260 | 1.5 E-05 | - | 8.4 E-06 | NA | 2 E-05 |
| Surface Soil - 18 | Surface Soil | Aroclor 1254 | 3.9 E-05 | - | 2.2 E-05 | NA | 6 E-05 |
| Surface Soil - D | Surface Soil | Aroclor 1254 + Aroclor 1260 | 1.5 E-06 | - | 8.6 E-07 | NA | 2 E-06 |

Table 6. Risk Characterization Summary for CTE Exposures for Individual Properties for Remediation.

Scenario Timeframe: Current/Future
Receptor Population: Child
Receptor Age: 0 to 6 Years Old

| Medium and Property | Exposure Medium | Chemical of Concern | Ingestion | Inhalation | Dermal | External Radiation | Exposure Routes Total |
|---|---|---|---|---|---|---|---|
| Surface Soil - 1 | Surface Soil | Aroclor 1254 | 1.3 E-06 | - | 2.0 E-07 | NA | 1 E-06 |
| Surface Soil - 13 | Surface Soil | Aroclor 1254 + Aroclor 1260 | 8.8 E-06 | - | 1.4 E-06 | NA | 1 E-05 |
| Surface Soil - 18 | Surface Soil | Aroclor 1254 | 2.3 E-05 | - | 3.5 E-06 | NA | 3 E-05 |
| Surface Soil - D | Surface Soil | Aroclor 1254 + Aroclor 1260 | 8.9 E-07 | - | 1.4 E-07 | NA | 1 E-06 |

Scenario Timeframe: Current/Future
Receptor Population: Adult
Receptor Age: 19 Years or Older

| Medium and Property | Exposure Medium | Chemical of Concern | Ingestion | Inhalation | Dermal | External Radiation | Exposure Routes Total |
|---|---|---|---|---|---|---|---|
| Surface Soil - 1 | Surface Soil | Aroclor 1254 | 2.0 E-07 | - | 3.2E-08 | NA | 2 E-07 |
| Surface Soil - 13 | Surface Soil | Aroclor 1254 + Aroclor 1260 | 1.4 E-06 | - | 2.2 E-07 | NA | 2 E-06 |
| Surface Soil - 18 | Surface Soil | Aroclor 1254 | 3.6 E-06 | - | 5.8 E-07 | NA | 4 E-06 |
| Surface Soil - D | Surface Soil | Aroclor 1254 + Aroclor 1260 | 1.4 E-07 | - | 2.3 E-08 | NA | 2 E-07 |

Table 7. Risk Characterization Summary for RME Exposures for Individual Properties Requiring Remediation.

Scenario Timeframe: Current/Future
Receptor Population: Child
Receptor Age: 0 to 6 Years Old

| | | | | Non-Cancer Hazard Index | | | |
|---|---|---|---|---|---|---|---|
| Medium and Property | Exposure Medium | Chemical of Concern | Primary Target Organ | Ingestion | Inhalation | Dermal | Exposure Routes Total |
| Surface Soil - 01 | Surface Soil | Aroclor 1254 | Eyes/ Immune System | 1.5 | NA | 0.58 | 2 |
| Surface Soil - 13 | Surface Soil | Aroclor 1254 + Aroclor 1260 | Eyes/Immune System | 10.5 | NA | 4.1 | 14 |
| Surface Soil - 18 | Surface Soil | Aroclor 1254 | Eyes/Immune System | 26 | NA | 10 | 36 |
| Surface Soil - D | Surface Soil | Aroclor 1254 + Aroclor 1260 | Eyes/Immune System | 1.04 | NA | 0.41 | 1.5 |

Table 7 - Continued.

Scenario Timeframe: Current/Future
Receptor Population: Adult
Receptor Age: 19 Years or Older

| | | | | Non-Cancer Hazard Index | | | |
|---|---|---|---|---|---|---|---|
| Medium and Property | Exposure Medium | Chemical of Concern | Primary Target Organ | Ingestion | Inhalation | Dermal | Exposure Routes Total |
| Surface Soil - 1 | Surface Soil | Aroclor 1254 | Eyes/Immune System | 0.16 | NA | 0.09 | 0.3 |
| Surface Soil - 13 | Surface Soil | Aroclor 1254 + Aroclor 1260 | Eyes/ Immune System | 1.1 | NA | 0.6 | 2 |
| Surface Soil - 18 | Surface Soil | Aroclor 1254 | Eyes/Immune System | 2.8 | NA | 1.6 | 4 |
| Surface Soil - D | Surface Soil | Aroclor 1254 + Aroclor 1260 | Eyes/Immune System | 0.11 | NA | 0.06 | 0.2 |

Table 8 . Risk Characterization Summary for CTE Exposures for Individual Properties Requiring Remediation.

| Scenario Timeframe: Current/Future<br>Receptor Population: Child<br>Receptor Age: 0 to 6 Years Old | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | | | Non-Cancer Hazard Index | | | |
| Medium and Property | Exposure Medium | Chemical of Concern | Primary Target Organ | Ingestion | Inhalation | Dermal | Exposure Routes Total |
| Surface Soil - 1 | Surface Soil | Aroclor 1254 | Eyes/Immune System | 0.74 | NA | 0.12 | 0.9 |
| Surface Soil - 13 | Surface Soil | Aroclor 1254 + Aroclor 1260 | Eyes/Immune System | 5.2 | NA | 0.8 | 6 |
| Surface Soil - 18 | Surface Soil | Aroclor 1254 | Eyes/Immune System | 13.0 | NA | 2.1 | 15 |
| Surface Soil - D | Surface Soil | Aroclor 1254 + Aroclor 1260 | Eyes/Immune System | 0.52 | NA | 0.08 | 0.6 |

Table 8 - Continued.

Scenario Timeframe: Current/Future
Receptor Population: Adult
Receptor Age: 19 Years or Older

| | | | | Non-Cancer Hazard Index | | | |
|---|---|---|---|---|---|---|---|
| Medium and Property | Exposure Medium | Chemical of Concern | Primary Target Organ | Ingestion | Inhalation | Dermal | Exposure Routes Total |
| Surface Soil - 1 | Surface Soil | Aroclor 1254 | Eyes/Immune System | 0.08 | NA | 0.01 | 0.09 |
| Surface Soil - 13 | Surface Soil | Aroclor 1254 + Aroclor 1260 | Eyes/ Immune System | 0.56 | NA | 0.09 | 0.6 |
| Surface Soil - 18 | Surface Soil | Aroclor 1254 | Eyes/Immune System | 1.4 | NA | 0.2 | 2 |
| Surface Soil - D | Surface Soil | Aroclor 1254 + Aroclor 1260 | Eyes/Immune System | 0.06 | NA | 0.009 | 0.06 |

TABLE 9

SUMMARY OF COST ESTIMATES FOR SOIL ALTERNATIVES

| ALTERNATIVE | TOTAL CAPITAL COST | ANNUAL O&M COST | TOTAL PRESENT WORTH |
|---|---|---|---|
| **No Action** | $0 | $0 | $0 |
| **Limited Action; Engineering and Institutional Controls** | $520,000 | $20,000 | $770,000 |
| **Excavation and Off-Site Treatment/Disposal** | $760,000 | $0 | $760,000 |

Table 10
Capital Costs for the Selected Remedy

| Description | Quantity | Mat. unit | Material | Ins. unit | Installation | Total |
|---|---|---|---|---|---|---|
| I. Decontamination Pad | 1 | 5000 | 500 | 2,000 | 2,000 | 2,500 |
| II. Excavation of off-site soils | 2,105 | 0 | 0 | 20 | 21,052 | 21,052 |
| III. Backfill of off-site excavated area with clean fill, grade and compact | 2,105 | 20 | 42,104 | 10.00 | 21,052 | 63,157 |
| IV. Property Restoration | 15 | 2,500 | 37,500 | 2,500 | 37,500 | 75,000 |
| IVa. Replacement Contingency - 10% | | | | | | 7,500 |
| V. Off-site disposal of contaminated soils at a RCRA landfill | 3,158 | 0 | 0 | 75 | 236,838 | 236,838 |
| VI. Interior Cleaning | 7 | 0 | 0 | 20,000 | 140,000 | 140,000 |
| VII. Health and Safety | 1 | 0 | 0 | 10,000 | 10,000 | 10,000 |
| VIII. Mobilization/Demobilization | 1 | 0 | 0 | 5,000 | 5,000 | 5,000 |

| | |
|---|---|
| Subtotal | 561,046 |
| Contingency (20%) | 112,209 |
| Engineering (10%) | 56,105 |
| Legal (5%) | 26,052 |
| **Total Capital Cost** | **757,413** |

There is no O&M cost associated with the Selected Remedy.

# APPENDIX III

# ADMINISTRATIVE RECORD INDEX

# CORNELL DUBILIER ELECTRONICS, INC.
# OPERABLE UNIT ONE
# ADMINISTRATIVE RECORD FILE
# INDEX OF DOCUMENTS

## 2.0 REMOVAL RESPONSE

### 2.1 Sampling and Analysis Plans

P. 200001 - 200040 — Plan: Site-Specific Health and Safety Plan, Cornell-Dubilier Site, Southern Plainfield, New Jersey, prepared by Earth Tech, Inc., prepared for U.S. EPA, Region II, April 3, 1998.

P. 200041 - 200219 — Plan: Revised Residential Property Removal Action Work Plan, South Plainfield, New Jersey, prepared by Environ Corporation, prepared for Foley, Hoag & Eliot, for submission to U.S. EPA, Region II, September 1998. (Revised November 6, 1998.)

P. 200220 - 200231 — Plan: Residential Property Removal Action Work Plan, South Plainfield, New Jersey, Appendix B, Property Restoration Plan, prepared by Environ Corporation, prepared for Foley, Hoag & Eliot, for submission to U.S. EPA, Region II, October 1998.

P. 200232 - 200319 — Letter to Mr. Eric Wilson, On-Scene Coordinator, U.S. EPA, Region II, from Mr. Michael P. Scott, Principal, Environ Corporation, re: Cornell Dubilier Electronics Site - Administrative Order on Consent for Removal Action, Index No. II-CERCLA-99-2006, Revised Tier II Residential Property Removal Action Work Plan, May 21, 1999. (Attachment: Plan: Revised Removal Action Work Plan for Tier II Residential Properties. South Plainfield, New Jersey, prepared by Environ Corporation, prepared for Foley, Hoag & Eliot, LLP, and Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C., for submission to U.S. EPA, Region II, April 1999. (Revised: May 21, 1999.)

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

P. 200320 - 200340 — Report: Sampling Trip Report, prepared by Mr. Michael Mahnkopf, Region II START Project Manager, Roy F. Weston, Inc., prepared for U.S. EPA, Region II, July 2, 1997.

| | | |
|---|---|---|
| P. | 200341 - 200391 | Transmittal Memo to Mr. Eric Wilson, On-Scene Coordinator, Removal Action Branch, U.S. EPA Region II, from Mr. Edward Moyle, Data Reviewer, Roy F. Weston, Inc., and Mr. Michael Mahnkopf, Project Manager, START, Roy F. Weston, Inc., Region II, re: Cornell Dubilier Electronic Site Data Validation Assessment, August 4, 1997. |
| P. | 200392 - 200428 | Transmittal Memo to Mr. Eric Wilson, On-Scene Coordinator, Removal Action Branch, U.S. EPA Region II, from Mr. Adly A. Michael, Data Reviewer, Roy F. Weston, START, Region II, re: Cornell Dubilier Electronic, Site, Data Validation Assessment, August 4, 1997. |
| P. | 200429 - 200487 | Report: Final Report, Vacuum Dust Sampling, Cornell Dubilier Electronics, South Plainfield, New Jersey, prepared by Roy F. Weston, Inc., prepared for U.S. EPA, Region II, February 1998. |
| P. | 200488 - 201105 | Letter to Mr. Eric Wilson, On-Scene Coordinator, Removal Action Branch, U.S. EPA, Region II, from Mr. Michael Mahnkopf, Project Manager, Roy F. Weston, Inc., re: Tier I Residential Sampling and Analysis Summary Report, Cornell Dubilier Electronics, June 25, 1998. (Attachment: Report: Tier I Residential Sampling and Analysis Summary Report, Cornell Dubilier Electronics, South Plainfield.,Middlesex County, New Jersey, prepared by Superfund Technical Assessment and Response Team, Roy F. Weston, Inc., prepared for U.S. EPA, Region II, June 25, 1998.) |
| P. | 201106 - 201670 | Letter to Mr. Eric Wilson, On-Scene Coordinator Removal Action Branch, U.S. EPA, Region II, from Mr. Michael Mahnkopf, Project Manager, Roy F. Weston, Inc., re: Tier II Residential Sampling and Analysis Summary Report, Cornell Dubilier Electronics, July 2, 1998. (Attachment: Report: Tier II Residential Sampling and Analysis Summary Report, Cornell Dubilier Electronics, South Plainfield, Middlesex County, New Jersey, prepared by Superfund Technical Assessment and Response Team, Roy F. Weston, Inc., prepared for U.S. EPA, Region II, July 2, 1998.) |
| P. | 201671 - 201841 | Letter to Mr. Eric Wilson, On-Scene Coordinator Removal Action Branch, U.S. EPA, Region II, from Mr. Michael Mahnkopf, Project Manager, Roy F. Weston, Inc., re: Tier III Residential/Neighborhood Sampling and Analysis Summary Report - Cornell Dubilier Electronics, July 10, 1998. (Attachment: Report: Tier III. Residential/Neighborhood Sampling and Analysis Summary Report - Cornell Dubilier Electronics, prepared by Superfund Technical Assessment and Response Team, Roy F. Weston, Inc., prepared for U.S. EPA, Region II, July 10, 1998.) |

| | | |
|---|---|---|
| P. | 201842 - 202005 | Report: Final Report, Vacuum Dust Sampling, Cornell Dubilier Electronics, South Plainfield, New Jersey, prepared by Roy F. Weston, Inc., prepared for U.S. EPA, Region II, July 1998. |
| P. | 202006 - 202082 | Report: Final Report, Vacuum, Wipe, and Soil Sampling, Cornell Dubilier Electronics, South Plainfield, New Jersey, prepared by Roy F. Weston, Inc., prepared for U.S. EPA, Region II, December 1998. |
| P. | 202083 - 202168 | Letter to Mr. Eric Wilson, On-Scene Coordinator Removal Action Branch, U.S. EPA, Region II, from Mr. Michael Mahnkopf, Project Manager, Roy F. Weston, Inc., re: Tier I Residential Sampling and Analysis Summary Report, Addendum No. 1 - Cornell Dubilier Electronics, February 16, 1999. (Attachment: Report: Tier I Residential Sampling and Analysis Summary Report, Addendum No. 1, Cornell Dubilier Electronics, South Plainfield, Middlesex County, New Jersey, prepared by Superfund Technical Assessment and Response Team, Roy F. Weston, Inc., prepared for U.S. EPA, Region II, February 16, 1999.) |
| P. | 202169 - 202238 | Letter to Mr. Eric Wilson, Cornell-Dubilier Electronics Site, On-Scene Coordinator, U.S. EPA, Region II, from Mr. Michael P. Scott, Principal, Environ Corporation, re: Cornell Dubilier Electronics Site - Administrative Order on Consent for Removal Action, Index No. II-CERCLA-98-0115, Final Report, July 21, 1999. (Attachment: Report: Tier I Residential Property. Removal Action Final Report, South Plainfield, New Jersey. Volume 1 of 2, prepared by Environ International Corporation, prepared for Foley, Hoag & Eliot, for submission to U.S. EPA, Region II, July 1999.) |
| P. | 202239 - 202590 | Report: Tier I Residential Property Removal Action Final Report, South Plainfield, New Jersey, Volume 2 of 2, prepared by Environ International Corporation, prepared for Foley, Hoag & Eliot, for submission to U.S. EPA, Region II, July 1999. |
| P. | 202591 - 202660 | Report: Tier II Residential Property Removal Action Final Report, South Plainfield, New Jersey, Volume 1 of 2, prepared by Environ International Corporation, prepared for Foley, Hoag & Eliot, LLP, Michael P. Last, Esq. c/o Rackemann, Sawyer & Brewster, for submission to U.S. EPA, Region II, January 2000. |
| P. | 202661 - 202894 | Report: Tier II Residential Property Removal Action Final Report, South Plainfield, New Jersey, Volume 2 of 2, prepared by Environ International Corporation, prepared for Foley, Hoag & Eliot, LLP, Michael P. Last, Esq. c/o Rackemann, Sawyer & Brewster, for submission to U.S. EPA, Region II, January 2000. |

P. 202895 - 203537 Letter to Mr. Eric Wilson, On-Scene Coordinator, U.S. EPA, Region II, from Mr. Michael Mahnkopf, Project Manager, Roy F. Weston, Inc., re: Floodplain Soil/Sediment Sampling and Analysis Summary Report, Cornell Dubilier Electronics, January 17, 2000. (Attachment: Report: Floodplain Soil/Sediment Sampling and Analysis Summary Report, Cornell Dubilier Electronics, South Plainfield, Middlesex County, New Jersey, prepared by Superfund Technical Assessment and Response Team, Roy F. Weston, Inc., prepared for U.S. EPA, Region II, January 17, 2000.)

## 3.0 REMEDIAL INVESTIGATION

### 3.3 Work Plans

P. 300001 - 300672 Plan: Final Work Plan for Remedial Investigation/Feasibility Study, Cornell Dubilier Electronics Superfund Site, South Plainfield, Middlesex County, New Jersey, prepared by Foster Wheeler Environmental Corporation, prepared for U.S. EPA, Region II, March 2000.

### 3.4 Remedial Investigation Reports

P. 300673 - 300723 Report: Final Pathways Analysis Report for Remedial Investigation/ Feasibility Study, Cornell Dubilier Electronics Superfund Site, South Plainfield, Middlesex County, New Jersey, prepared by Foster Wheeler Environmental Corporation, prepared for U.S. EPA, Region II, May 2000.

P. 300724 - 301835 Report: Final Remedial Investigation Report for Operable Unit 1 (OU-1), Off-Site Soils, for Cornell-Dubilier Electronics Superfund Site, South Plainfield, Middlesex County, New Jersey, prepared by Foster Wheeler Environmental Corporation, prepared for U.S. EPA, Region II, August 2001.

## 4.0 FEASIBILITY STUDY

### 4.3 Feasibility Study Reports

P. 400001 - 400130 Report: Final Feasibility Study Report for Operable Unit 1 (OU-1) Off-Site Soils, for Cornell Dubilier Electronics Superfund Site, South Plainfield, Middlesex County, New Jersey, prepared by Foster Wheeler Environmental Corporation, prepared for U. S. EPA, Region II, August 2001.

## 7.0 ENFORCEMENT

### 7.3 Administrative Orders

P. 700001 - 700020 Letter to D.S.C. of Newark Enterprises, Inc., c/o Michael Colfield, Esq., from Muthu S. Sundram, Esq., Assistant Regional Counsel, U.S. EPA, Region II, re: Cornell Dubilier Electronics Site. South Plainfield, Middlesex County N.J., EPA Order Index Number II-CERCLA-97-0109, undated. (Attachment: Administrative Order in the Matter of: Cornell-Dubilier Electronic Site, South Plainfield, New Jersey, D.S.C. of Newark Enterprises, Inc., Respondent, Index No: II CERCLA-97-0109, prepared by U.S. EPA, Region II, March 25, 1997.)

P. 700021 - 700051 Administrative Order on Consent for Removal Action, in the Matter of: The Cornel1-Dubilier Electronics Superfund Site, Cornell Dubilier Electronics, Inc., D.S.C. of Newark Enterprises, Inc., Respondents, Index Number II, CERCLA-98-0115, prepared by U S. EPA, Region II, August 6, 1998.

P. 700052 - 700085 Administrative Order on Consent for Removal Action, in the Matter of: The Cornell Dubilier Electronics Superfund Site, Cornell Dubilier Electronics, Inc., Dana Corporation, Respondents, Index Number II, CERCLA-99-2006, prepared by U. S. EPA, Region II, February 23, 1999.

P. 700086 - 700116 Administrative Order on Consent for Removal Action, in the Matter of: The Cornell Dubilier Electronics Superfund Site, D.S.C. of Newark, Inc., Respondent, Index Number, CERCLA-02-2000-2005, prepared by U.S. EPA, Region II, June 26, 2000.

## 8.0 HEALTH ASSESSMENTS

### 8.1 ATSDR Health Assessments

P. 800001 - 800022 Report: Human Health Risk Assessment, Residential Soils Surrounding the Cornell-Dubilier Site, South Plainfield. New Jersey, prepared by Program Support Branch, Emergency and Remedial Response Division, U.S. EPA, Region II, June 2, 1998.

P. 800023 - 800042 Report: Health Consultation, Cornell Dubilier Electronics Incorporated, South Plainfield, Middlesex County, New Jersey, prepared by U.S. Department of Health and Human Services, Public Health Service, Agency for Toxic Substances and Disease Registry, Division of Health Assessment and Consultation, December 17, 1998.

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| P. | 800043 - 800058 | Report: Health Consultation, Cornell Dubilier Electronics Incorporated, South Plainfield, Middlesex County, New Jersey, prepared by U.S. Department of Health and Human Services, Public Health Service, Agency for Toxic Substances and Disease Registry, Division of Health Assessment and Consultation, June 10, 1999. |
| P. | 800059 - 800177 | Report: Public Health Assessment for Cornell Dubilier Electronics Incorporated, South Plainfield, Middlesex County, New Jersey, prepared by New Jersey Department of Health and Senior Services, Hazardous Site Health Evaluation Program, Consumer and Environmental Health Services, Division of Epidemiology, Environmental and Occupational Health, Under a Cooperative Agreement with the U.S. Department of Health and Human Services, Public Health Service, Agency for Toxic Substances and Disease Registry, September 20, 2000. |
| P. | 800178 - 800212 | Report: Risk Assessment for Soils and Dust from Areas Surrounding the Cornell-Dubilier Site, undated. |

# CORNELL DUBILIER ELECTRONICS, INC.
# OPERABLE UNIT ONE
# ADMINISTRATIVE RECORD FILE UPDATE
# INDEX OF DOCUMENTS

## 7.0 ENFORCEMENT

### 7.3 Administrative Orders

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|---|---|---|
| P. | 700117 - 700144 | Administrative Order for Removal Action, in the Matter of the Cornell-Dubilier Electronics Superfund Site, D.S.C. of Newark, Inc., Federal Pacific Electric Company, Respondents, Index Number CERCLA-02-99-2012, prepared by U.S. EPA Region II, April 28, 1999. |

## 10.0 PUBLIC PARTICIPATION

### 10.9 Proposed Plan

| | | |
|---|---|---|
| P. | 10.00001-10.00014 | Superfund Program Proposed Plan, Cornell-Dubilier Electronics Site, prepared by U.S. EPA, Region II, June 2003. |

# APPENDIX IV

# STATE CONCURRENCE LETTER

State of New Jersey
Department of Environmental Protection

James E. McGreevey
*Governor*

Bradley M. Campbell
Commissioner

SEP 03 2003

Ms. Jane Kenny
Regional Administrator
USEPA - Region 2
290 Broadway
New York, N.Y. 10007-1866

Dear Ms. Kenny:

The New Jersey Department of Environmental Protection has evaluated and agrees with implementing the following specific components of the selected remedy for Operable Unit One (OU-1) at the Cornell-Dubilier Electronics Site (CDE) as stated below:

- Excavation of an estimated 2,100 cubic yards of contaminated soil from approximately 16 properties, backfilling with clean fill, and property restoration as necessary;

- Transportation of the contaminated soil off-site for disposal, with treatment as necessary;

- Indoor dust remediation where PCB-contaminated dust is encountered;

- Where necessary, temporary relocation of residents during the indoor remediation; and,

- An additional investigation of the Pre-RI and RI study areas in accordance with N.J.A.C. 7:26 E (Technical Requirements for Site Remediation) to determine if additional properties require remediation.

Although the State agrees with EPA's remedial action, the State disagrees with EPA's selection of 1 ppm as the PCB remediation goal for this action. The NJDEP believes its criteria of 0.49 ppm for PCBs is an ARAR and, therefore, should be the selected remediation goal for this site. It is expected that either EPA's action will coincidentally achieve the State's criteria, or that the Potential Responsible Parties will use the State's criteria for this site. However, the State reserves its right to contest this issue in court

should it be necessary. It is also important for the State and EPA to coordinate all enforcement actions on this site in order to avoid litigation over the criteria issue.

The State of New Jersey appreciates the opportunity to participate the decision making process and looks forward to future cooperation with the USEPA.

Sincerely,

Evan Van Hook
Assistant Commissioner

# APPENDIX V
# RESPONSIVENESS SUMMARY
# CORNELL-DUBILIER ELECTRONICS SUPERFUND SITE
# OPERABLE UNIT ONE

## INTRODUCTION

This Responsiveness Summary provides a summary of the public's comments and concerns regarding the Proposed Plan for the Cornell-Dubilier Electronics Site, and EPA's responses to those comments. At the time of the public comment period, EPA proposed a preferred alternative for remediating soils and indoor dust at properties in the vicinity of the former Cornell-Dubilier Electronics facility, which has been designated Operable Unit 1 (OU1) . All comments summarized in this document have been considered in EPA's final decision for the selection of a remedial alternative for OU1.

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 Cornell-Dubilier Electronics 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, as well as responses to written comments received during the public comment period.

The last section of this Responsiveness Summary includes 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 notices that appeared in Observer-Tribune and the Courier-News;

**Attachment C**: the transcripts of the public meeting; and

**Attachment D**: the written comments received by EPA during the public comment period.

## I. BACKGROUND ON COMMUNITY INVOLVEMENT AND CONCERNS

Since the first public information session for this Site was held by EPA on June 19, 1997, the level of community involvement and concern with the Site has been high. EPA has conducted an extensive community relations program to meet the community's need for information and to

support community participation in seeking remedies for the Site. Since 1997, EPA has held one-on-one meetings and public information sessions with area residents and tenants at the industrial park to explain the findings on the investigation and the sampling results for their properties. In addition to the public participation responsibilities associated with developing the OU1, OU2, and OU3 remedies, EPA has provided the community with fact sheets on the Site.

EPA's Proposed Plan for OU1 was released to the public on June 16, 2003, and starting that same day, EPA held a public comment period to solicit community input and ensure that the public remains informed about Site activities. On June 10, 2003 a copy of the Proposed Plan was mailed to approximately 160 individuals on a mailing list maintained by EPA for the Site. A copy of the Proposed Plan and supporting documentation was placed in the Administrative Record and was made available in the information repositories maintained at the EPA Region II office (290 Broadway, New York, New York) and at the South Plainfield Public Library (2484 Plainfield Avenue, South Plainfield, New Jersey). Public notices were published in local newspapers The Courier-News on June 16, 2003 and The Observer-Tribune on June 19, 2003, advising the public of the availability of the Proposed Plan. The notices also announced the opening of a public comment period on June 16, 2003 and invited all interested parties to attend an upcoming public meeting. The public comment period closed on July 16, 2003.

A public meeting to present the preferred remedial alternative for OU1 was held at the South Plainfield Municipal Building, 2480 Plainfield Avenue, South Plainfield, New Jersey on June 23, 2003.

## II. COMPREHENSIVE SUMMARY OF MAJOR QUESTIONS, COMMENTS, CONCERNS, AND RESPONSES

### PART 1: Verbal Comments

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

### A. SUMMARY OF QUESTIONS AND EPA'S RESPONSES FROM THE PUBLIC MEETING CONCERNING OU1 OF THE CORNELL-DUBILIER ELECTRONICS SITE - JUNE 23, 2003

A public meeting was held June 23, 2003, at 7:00 p. m. at the South Plainfield Municipal Building, 2480 Plainfield Avenue, South Plainfield, New Jersey. Following a brief presentation of the investigation findings, EPA presented the Proposed Plan and preferred alternative for OU1 of the Cornell-Dubilier Electronics Site, received comments from interested citizens, and responded to questions regarding the remedial alternatives under consideration.

Although the purpose of the public meeting was to take public comments on EPA's preferred remedy for OU1, some commenters had questions/comments about additional operable units

such as the status of the RI/FS for OU2 and OU3. Comments and questions raised by the public following EPA's presentation are categorized by relevant topics and presented as follows:

a. Remedial Action Objectives
b. Extent of Contamination
c. Public Acceptance and Short-term Effectiveness
d. Health
e. Operable Unit 2
f. Operable Unit 3

**a. Remedial Action Objectives**

**Comment #1**: Several residents commented on the soil cleanup criteria for PCBs. Residents asked why EPA doesn't use the State criterion of 0.49 ppm for PCBs as the remediation goal in this remedy, and whether NJDEP is going to require the implementation of a deed restriction or deed notice on properties that exceed the State of New Jersey residential direct contact soil cleanup criterion of 0.49 ppm for PCBs.

**EPA response**: EPA's August 1990 guidance, entitled "Guidance on Remedial Actions at Superfund Sites with PCB Contamination", recommends a cleanup goal of 1 ppm for unrestricted residential land use, and EPA is using 1 ppm as its Remediation Goal in this remedy. The State of New Jersey has developed a residential direct contact soil cleanup criterion (RDCSCC) for PCBs of 0.49 ppm. Because this is not a promulgated standard, it is not an "Applicable or Relevant and Appropriate" standard (ARAR) but rather a "To Be Considered" (TBC) criterion. It is possible that in the implementation of the remedy, the State of New Jersey criterion of 0.49 ppm for PCBs may be achieved. On properties where the State criterion is not achieved, NJDEP may elect to take or require additional actions to meet its more stringent standard.

**Comment #2**: A resident questioned when the State would require additional work to be performed in order to meet the State criterion.

**EPA response**: It is anticipated that the State of New Jersey will determine whether additional soil must be excavated in order to meet the State criterion prior to the work being completed, so that any additional soil excavation required by the State could be performed at the same time.

**Comment #3**: A resident asked for clarification on the issue of deed restrictions with respect to the residential properties.

**EPA response**: Alternative 2 would require the implementation of institutional controls, such as deed notices or use restrictions, to limit future use of the properties because PCB-contaminated soil above 1 ppm would remain on the properties.

## b. Extent of Contamination

**Comment #4**: A resident asked whether EPA would be sampling the homes where removal actions were previously performed. In addition, the commenter asked whether, if exceedances were found at these properties where removal actions were previously conducted, would that indicate that the properties had been re-contaminated from dust migration from the former facility property.

**EPA response**: As a precaution, the selected remedy includes the re-evaluation of properties cleaned during the removal actions previously conducted to ensure the earlier cleanups are consistent with the selected remedy. Even if exceedances are found at properties previously cleaned, EPA does not believe that would indicate that migration from the facility property is an ongoing problem. A number of actions have been taken at the facility to prevent off-site migration of dust, including fencing off and vegetating the unpaved rear of the facility. EPA believes that there is no longer a migration potential.

**Comment #5**: Several residents asked if EPA has conducted air monitoring along the fenceline of the industrial park (OU2) to determine whether or not contamination and/or vapors are migrating from the industrial park to the residential properties.

**EPA response**: EPA has not collected air monitoring data along the fenceline of the industrial park. The need to collect additional data to determine if fugitive dust emissions are present at the industrial park and impacting the surrounding community will be evaluated during the remedial design.

**Comment #6**: A resident asked how the boundary for the OU1 sampling program was defined. In addition, the resident asked whether the parks located adjacent to the Bound Brook have been impacted by the former CDE facility and whether residents along the Bound Brook can request sampling on their properties.

**EPA response**: EPA evaluated the results of the Tier I, Tier II, and Tier III sampling events (performed in the late 1990s by EPA's removal program) and expanded the study area as part of the RI/FS using a worst-case scenario for wind-blown dust or dust caused by traffic, in order to provide a broader scope of the investigation and identify PCB distribution trends. EPA is confident that the RI identified the limits of the problem. The boundaries of the area sampled are not rigidly sampled, and residents near the boundaries who would like their properties sampled may make a request to EPA.

As part of this sampling approach, EPA sampled properties and public right-of-ways within the Bound Brook flood plain, located downstream of the former CDE facility. None of these soil samples exceeded 1 ppm total PCBs. EPA intends to conduct further investigations of the Bound Brook as part of the RI/FS for OU3.

**Comment #7**: A resident asked how many additional properties will require remediation and the location of the properties.

**EPA response**: Sampling performed by EPA has identified four properties with PCBs in soil that require remediation. In addition, EPA has conservatively estimated that additional sampling may identify up to 12 affected properties that will require soil cleanup, and seven that will require indoor dust remediation because of elevated PCB levels. The seven properties with indoor dust requiring remediation may or may not be a subset of the properties requiring soil remediation.

The four properties with PCBs in soil that are currently known to require remediation are located on Hamilton Boulevard, Spicer Avenue, and Arlington Avenue. They are not clustered in any one area.

**Comment #8**: A resident asked why sampling was performed up to Sampton Avenue since there has never been flooding on that street.

**EPA response**: EPA collected samples on Fred Alien Drive, Schillaci Lane, Oakmoor Avenue, and Lowden Avenue to determine if flooding of the Bound Brook had impacted residential properties located within the floodplain of the Bound Brook. In order to determine any pattern or trends in the data, EPA collected data up to Sampton Avenue.

**Comment #9**: A resident asked for the sampling results for the Roosevelt school.

**EPA response**: The average concentration of total PCBs for the samples collected at the Roosevelt School was 0.057 ppm.

**Comment #10**: A resident asked how the areas requiring additional sampling were targeted and whether other properties can be re-sampled.

**EPA response**: The additional sampling would typically be performed on properties where curbside sampling revealed elevated levels of PCBs, and where additional data is required to determine whether or not remediation is necessary. Residents whose properties do not meet these criteria may also request sampling.

**Comment #11**: A resident inquired how soil sampling would be performed at his property, since topsoil had been placed on his property as cover.

**EPA response**: Prior to conducting the sampling, EPA will coordinate with the owners of the affected properties to determine the location and depths of any cover material. Based on this information, samples will be targeted to be collected below any topsoil that may have been placed on the properties.

**Comment #12**: A resident asked for the soil results for the areas along Arlington Avenue that have been targeted for additional sampling.

**EPA response**: PCBs were detected in curbside right-of-way sampling on Arlington Avenue at concentrations ranging from "non detectable" to 2.9 ppm.

**Comment #13**: A resident asked where the samples for the curbside right-of-way were collected.

**EPA response**: Samples were typically collected within 1 to 2 feet from the curb and within the first few inches of the ground surface. Additional samples were collected at 16 to 18-inches below ground surface.

**Comment #14**: A resident asked whether EPA has sampled the storm water catch basins located in the curbside right-of-ways or whether there are any plans to perform that sampling.

**EPA response**: EPA has not sampled the sediments of the catch basins. However, during the remedial design, this recommendation will be evaluated.

**Comment #15**: A resident asked for clarification regarding the sampling results on her property and questioned whether the property was safe at the concentrations detected.

**EPA response**: Sampling performed by EPA detected PCBs in soil at the property in question at a maximum concentration of 44 ppm. PCBs in soil at this property pose a potential health concern and require remediation, but there is no immediate threat to exposure of PCB-contaminated soil at these concentrations. The 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 surface and subsurface soil, as well as the toxicity of PCBs.

### c. Public Acceptance and Short-term Effectiveness

**Comment #16**: A resident asked what measures EPA will take to protect the residents during the implementation of the remedy from dust contamination resulting from the transport of the contaminated soil along high traffic areas, such as Hamilton Boulevard during remediation.

**EPA response**: An increase in the potential for dust generation in the surrounding community during the performance of the work is a short-term risk that needs to be managed. This potential impact would be created through construction activities and exposure to the contaminated soil to be excavated and handled. However, proven protective measures including engineering controls and safe work practices would be used to address potential impacts to the community.

**Comment #17**: An interested citizen asked whether EPA has given any consideration to transporting the contaminated soil by rail.

**EPA response**: Transportation routes and the method of transportation (e.g. via rail or truck) will be evaluated during the remedial design. The FS assumed truck transportation.

**Comment #18**: A resident asked what measures will be implemented to ensure that the residential properties along Spicer Avenue are not re-contaminated as a result of future remedial actions at the industrial park.

**EPA response**: Proven procedures including engineering controls and safe work practices would be used to address potential impacts to the community. In addition, the appropriate air monitoring would be performed, during the implementation of any remedial action at the site.

**Comment #19**: A resident asked whether the Borough of South Plainfield should implement any changes in its street sweeping program.

**EPA response**: No changes are required to the Borough's street sweeping program.

**Comment #20**: A resident asked whether the homes that require remediation should have some type of temporary fencing installed to indicate that the area needs to be remediated and to keep people off of the area until such time as the property has been remediated.

**EPA response**: Restricting access to areas requiring remediation is not necessary.

**d. Health**

**Comment #21**: A resident asked whether there are other contaminants besides PCBs, such as solvents, that the residents should be concerned about.

**EPA response**: During the earlier removal investigations, it was determined that the contaminant of concern for OU1 was PCBs.

**Comment #22**: A resident asked whether an average concentration of 0.61 ppm of PCBs in soil is safe.

**EPA response**: EPA conducted a baseline risk assessment, as part of the RI/FS for the properties in the vicinity of the former CDE facility to determine the current and future effects of PCBs on human health. Based on the August 1990 guidance, entitled "Guidance on Remedial Actions at Superfund Sites with PCB Contamination", a Remediation Goal of 1 ppm was selected. The Remediation Goal of 1 ppm is within EPA's protective risk range,

**Comment #23**: A resident asked how PCBs can enter a person's body.

**EPA response**: Exposure pathways for PCBs include ingestion and dermal contact through the skin.

**Comment #24**: A resident asked for clarification on the term "immediate" as it pertains to risk assessments.

**EPA response**: EPA has determined that PCBs cause cancer in animals and probably cause cancer in humans. PCBs cause these effects over long periods of time. The risk estimates are based on exposure over a 30 year period.

### e. Operable Unit 2

**Comment #25**: A resident asked for clarification on the cleanup goal for residential properties versus the cleanup goal for the former CDE facility.

**EPA response**: The cleanup criteria for the soil at the former CDE facility will be presented in the Feasibility Study for Operable Unit 2 and the Proposed Plan for that operable unit.

**Comment #26**: A resident asked what action will be taken to address the contaminated facility soils, facility buildings, and groundwater.

**EPA response**: Remedial Actions to address the facility soils and facility buildings (OU2), and groundwater and the Bound Brook (OU3) will be presented in future Proposed Plans and Records of Decision.

### f. Operable Unit 3

**Comment #27**: A resident asked whether any sampling has been or will be performed on the private water supply wells in the area. In addition, the resident questioned whether the excavation of contaminated soil could impact the water quality of these wells.

**EPA response**: An "unknown source investigation" conducted by the NJDEP in the vicinity of Hamilton Boulevard between 1988 to 1991 revealed significant groundwater contamination consisting of mainly trichloroethene (TCE) and tetrachloroethene (PCE). Due to widespread contamination, all residential wells in the area were reportedly closed and residences were hooked up to a water main providing potable water from another location. As part of the RI for OU3, EPA will be conducting a well survey of any private wells within several miles of the site. If there are any residents in the area who still rely on private wells, the New Jersey Department of Health and Senior Services currently offers sampling of residential drinking water wells at the request of the home owner.

Furthermore, soil sampling of surface and subsurface soils in these vicinity properties has indicated that the PCB contamination is predominantly in the shallow soils (1 to 2 feet in depth). EPA does not anticipate that the excavation of surface soils will impact the groundwater in this area.

**Comment #28**: A resident asked if there are other sources of PCB contamination to the Bound Brook.

**EPA response**: As part of its ongoing investigation of OU3, EPA will evaluate the potential for additional sources of contamination of the Bound Brook. For example, the Bound Brook transects the Woodbrook Road Dump Superfund Site, located in South Plainfield, New Jersey upgradient of the CDE Site. Sampling performed by EPA has revealed PCB contamination at the Woodbrook Road Dump Site.

**Comment #29**: A resident asked when the sampling along the Bound Brook was performed and whether or not fluctuations in rainfall could have impacted nearby properties, including nearby ball fields.

**EPA response**: Initial sampling along the banks of the Bound Brook was performed by EPA in 1997. In 1998 and 1999, EPA collected additional samples within the Bound Brook floodplain, including the municipal parks and ball fields. Sampling results revealed PCB concentrations in soil ranging from non-detect to 25 ppm in Veterans Memorial Park. EPA anticipates performing additional investigations of the Bound Brook as part of OU3.

**Comment #30**: A resident raised a concern that soil sampling has not been performed at the baseball field located south of Belmont Avenue and adjacent to the Bound Brook.

**EPA response**: The area in question could not have been impacted by the CDE site, but may be impacted by the Woodbrook Road Dump Superfund site. Additional investigations will be performed to determine the impact of the Woodbrook Road Dump Superfund site on properties located downstream of that site and in the floodplain of the Bound Brook.

**Comment #31**: A resident asked if the use of all-terrain vehicles along the banks of the Bound Brook creates a health threat to the vehicles' users, since the corridor has not been tested.

**EPA response**: EPA sampled a 2.4 mile stretch of the Bound Brook. This sampling included the north and south banks of the Bound Brook. An evaluation of the data by ATSDR indicated that the levels of PCBs in the sediments and soil of the Bound Brook do not pose an immediate health threat to the recreational user.

**Comment #32**: A resident asked about fishing in New Market Pond and indicated that there are no signs regarding the advisory.

**EPA response**: In 1997, NJDEP posted a fish consumption advisory for the Bound Brook and its tributaries. Signs were posted along the Bound Brook and New Market Pond. EPA will work with the Borough of South Plainfield to replace signs that are missing.

**Comment #33**: A resident asked whether the groundwater contamination at the industrial park has extended into the residential neighborhood and whether there is an indoor air problem as a result of the contaminated groundwater at the industrial park.

**EPA response**: As part of the investigation of OU3, EPA anticipates collecting data to determine whether vapor intrusion is affecting the residential properties adjacent to the former CDE facility.

**Comment #34**: Several residents requested information concerning the results of surface water sampling downstream of the industrial park.

**EPA response**: Surface water sampling conducted by EPA in 1997, downstream of the industrial park revealed the presence of trichlorethene at a maximum concentration of 0.005 mg/L. Although no pesticides or PCB compounds were detected in any of these surface water samples, thirteen metals (aluminum, barium, chromium, copper, iron, potassium, magnesium, manganese, sodium, nickel, lead, vanadium, and zinc) were detected.

**PART 2: Written Comments**

Comments and concerns that were not addressed at the public meeting were accepted in writing during the public comment period. Written comments have been presented verbatim and identified in italicized print.

## B. WRITTEN COMMENTS RECEIVED DURING THE PUBLIC COMMENT PERIOD FROM CORNELL-DUBILIER ELECTRONICS, INC. AND DANA CORPORATION

Comments received from Cornell-Dubilier Electronics and Dana Corporation are categorized as follows:

a. Proposed Plan
b. Remedial Investigation Report
c. Feasibility Study Report

### a. Proposed Plan:

In a cover letter to its comments on the RI/FS, the Hamilton Industrial Park Group (HIPG), comprised of Cornell-Dubilier Electronics, Inc. and Dana Corporation, provided the following comment on EPA' s Preferred Alternative.

**Comment #1**: According to the Proposed Plan, USEPA has changed the scope of work from the one defined in the FS, including increasing the number of properties requiring additional sampling for further evaluation. Based on our recent discussions, I understand that this change was prompted by USEPA's use of a NJDEP cleanup criterion of 0.49 mg/kg rather than USEPA's cleanup criterion of 1 mg/kg. Because the NJDEP soil cleanup criterion has not been promulgated, and thus not an ARAR, and given that USEPA does have a regulatory basis for selecting a cleanup criterion of 1 mg/kg, the HIPG strongly opposes basing the scope of work defined in the Proposed Plan on NJDEP's cleanup criterion. In fact, the NJDEP's publication of

this criterion specifically states that this criterion "shall not be assumed to... represent the Department's opinion that a site requires remediation". Furthermore, the need for remediation should be based on site-specific risk analysis rather than a non-promulgated generic cleanup criterion.

**EPA response**: The Selected Remedy requires an investigation of additional properties in the study area, during the remedial design, to determine if additional properties require remediation. The additional sampling would typically be performed on properties where previous curbside sampling exceeded EPA's Remediation Goal of 1 ppm and New Jersey's RDCSCC of 0.49 ppm.

EPA is using 1 ppm for PCBs as its Remediation Goal in this remedy. Based on the data collected to date, in meeting EPA's cleanup levels for PCBs, EPA believes the remedy may also achieve the New Jersey residential direct contact soil cleanup criterion (RDCSCC) of 0.49 ppm for PCBs. If the remedy does not achieve the State criterion of 0.49 ppm for PCBs, the State may elect to pursue additional soil removal, or require that restrictions be placed on properties to prevent future direct contact with soils above 0.49 ppm.

**b. Remedial Investigation Report**

**Comment #2**: (Section 1.2.2) Insufficient information is provided regarding the use of the Hamilton Industrial Park after 1962 to assess other sources of contamination or site activities that could have contributed to potential transport of contamination to off-site locations. In particular, a truck driving school operated on the Hamilton Industrial Park site up until the mid-1990s and an auto junkyard was located between this property and Spacer Avenue during the early 1960s. Post-1962 aerial photographs suggest continued disturbance of the ground surface in the undeveloped portion of the Hamilton Industrial Park site (e.g. , March 1969) .

**EPA response**: Additional information regarding the use of the former CDE facility, including additional information for the period after 1962, is included in the RI Report for OU2.

**Comment #3**: (Section 1.2.3) Insufficient information is provided regarding the history of the residential property development. In particular, sampling and removal action activities uncovered buried debris - how did this material come to be present on these properties? A review of aerial photographs suggests that some of the homes in this area are not the original structures on these properties - when were the current homes constructed?

**EPA response**: Section 1.2.3 of the RI discusses information obtained from the Borough of South Plainfield regarding residential development in this area. Although the dates of construction for each individual home are not included, the general time frames for the development are included in the RI Report. EPA does not have any specific information concerning possible uses of the residential properties prior to construction of the homes, or the source of buried debris encountered on the properties during prior removal actions.

**Comment #4**: (Section 2.2) The OU-1 RI WorkPlan (Foster Wheeler 2000) stated that 36 properties were targeted for sampling during the RI.

- How were these initial 36 properties selected for sampling (e.g., previous sampling, adjacent to other contaminated properties, etc) ?

**EPA response**: A set of properties was initially identified based on previous sampling that suggested the presence of contamination but was inconclusive as to the need for remediation, proximity to other contaminated properties, and requests by property owners to have their properties sampled.

**Comment #5**: (Section 2.2) What was the basis for reducing the number of properties sampled to 20 as reported in the RI Report?

**EPA response**: The original work plan was modified to also include curbside right-of-way sampling, so as to attain a more comprehensive set of data for evaluating these neighborhoods.

**Comment #6**: (Section 2.2) Five of the 20 properties sampled as part of the RI were not part of the original 36 properties selected in the Work Plan. What was the basis for changing the actual properties to be sampled?

**EPA response**: As discussed in the response to Comment A. 4 above, EPA wanted to target some properties that were more likely to be contaminated based upon proximity and the results of previous sampling, since a site model indicated wind-blown and relatively shallow contamination. However, the sampling protocol also called for more randomized property selection, as a method of evaluating the accuracy of that site model. Furthermore, at the time EPA targeted properties for sampling in the RI Work Plan, EPA had not obtained access from the property owners. Therefore, additional changes were made as a result of access-related issues.

**Comment #7**: (Section 2.2) What was the overall sampling strategy for selecting sampling locations at each property, including the locations for collecting the deep soil samples? (For example, on Property 19 all deep samples were concentrated in one area and on six properties the collection of deep samples varied from the general approach of collecting one deep sample for every five shallow samples).

**EPA Response**: The strategy for selecting sampling locations was determined on a property-by-property basis. EPA made an effort to distribute the sampling locations across each property, taking into account the conditions encountered at each property. Regarding Property 19, the 16 to 18 inch samples were concentrated in one area because of refusal encountered by the hand auger when attempts were made to sample in the originally designated areas.

**Comment #8**: (Section 4.0) The HI suggests that "nearby areas were suspected to have the potential to be contaminated with PCBs, via airborne entrainment of contaminated particulates (i.e., fugitive dust emissions) and/or transport by vehicles." However, deep soil contamination

(e.g., below 1-foot) and evidence of fill material was also observed on sampled properties, which suggests that there are other/additional mechanisms by which contamination may be present on these properties (see Section 3.4.2). Were additional mechanisms for the presence of PCBs on these properties also considered in developing the potential scope of the investigation? For example, the 1969 aerial photograph suggests disturbance of the ground surface in the undeveloped portion of the Hamilton Industrial Park site.

**EPA Response**: The results of the RI support the conclusion regarding the mechanisms by which contamination may be present on these properties. One of the goals of the RI was to test various possible contaminant migration routes, including via flooding near the Bound Brook, and via wind-entrained dust near the industrial park. The comment suggests another possible migration route, through the movement of fill material or dumping, from a period that may even precede residential development. The RI did find fill material (debris and non-native soil) in some sampling locations, and a few of the deeper samples showed elevated PCB levels; however, the findings generally support a dust-borne migration pattern. As stated above in EPA's response to Comment B.3, EPA does not have any specific information concerning possible uses of the residential properties prior to construction of the homes, or the source of buried debris encountered on the properties during sampling or prior removal activities. EPA will evaluate any evidence that is presented to indicate that other sources of PCB contamination exist.

**Comment #9**: (Section 4.1) The RI Report indicates that an additional property was to be remediated under the removal program by the end of 2001. Was this work completed?

**EPA response**: As stated in the Proposed Plan, this work has not been completed. This property will be addressed consistent with the requirements of the selected remedy.

**Comment #10**: (Section 4.4.17) Why was Property 17, which had been characterized as part of the Tier II removal action program, resampled as part of the RI? Why was this sampling targeted to a specific 2-inch depth interval?

**EPA response**: Property 17 was resampled as part of the RI because the property owner indicated to EPA that soil from the excavation of a basement had been placed as cover in the rear of the property. As a result, the property owner claimed that the sampling that was performed during the Tier II sampling event was not representative of the surface soils. The resampling during the RI did not indicate a contamination problem on the property.

**Comment #11**: (Section 4.5) . Results for Tier II Property DD should be noted as reflecting results for a sample having elevated detection limits, and the 95% UCL for this property excluding this data point should also be presented. These results were discussed in Section 2.3.7 of the Tier II Residential Property Removal Action Final Report, South Plainfield, New Jersey (ENVIRON, January 2000). According to USEPA's Risk Assessment Guidance - Part A, elevated detection limits should be censored if these values would cause the calculated exposure concentration to exceed the maximum detected concentration.

**EPA response**: As indicated in the Proposed Plan and the Decision Summary, the Selected Remedy requires a re-evaluation of the 13 residential properties where removal actions have already been performed, to ensure that those cleanups are consistent with the remediation goals established here. EPA will evaluate the results from Tier II Property DD as part of that process.

**Comment #12**: (Section 5.2.1) This section refers to "improper" disposal practices [at the former CDE facility]. The nature of the disposal activities should be discussed in terms of the "state of the practice" at the time these activities may have occurred (i.e., what was the required or common industry practice at the time these activities reportedly occurred?).

**EPA response**: EPA acknowledges that, based on the information provided, the disposal practices at the former CDE facility may have been consistent with common industry practice, for at least some of the period of time during which disposal occurred.

**Comment #13**: (Section 6.3.1) The RI Report acknowledges that current land uses will likely continue into the future. However, it is then assumed for the human health risk assessment that all properties could be used for residential purposes. This contrarily assumes that current uses would change in the future. This assumption should be confirmed on a property-by-property basis before proceeding with remedial decision making. **For example, both Property 1 and Property 18 are currently commercial-use properties, and given the Borough of South Plainfield's formally adopted commercial redevelopment plan for this area, it would appear extremely unlikely, as veil as inconsistent with the local redevelopment and land use planning, that these properties will be converted to residential use in the future**. (A copy of the Redevelopment Plan for the Designated Redevelopment Area in the Vicinity of the Hamilton Boulevard Industrial Site ["Redevelopment Plan"; THP, April 2002] and the Borough of South Plainfield's Ordinance #1597 approving this Redevelopment Plan are provided as an attachment to these comments.)

If it is assumed that the current land uses will continue into the future, then the risks to indoor workers at the commercial properties would be lower than those calculated under a residential land use scenario, and as a result, Properties I and 18 would likely not be identified for remediation (the RME risk estimates for an adult resident only marginally exceeded an HQ of 1.0 for Property 18, and were within the acceptable cancer risk range for both properties). For example, using standard defaults (Supplemental Soil Screening Guidance; USEPA draft 2001), the risks to indoor workers at Properties 1 and 18 would be:

| | | |
|---|---|---|
| Property 1: | HQ = 0.06 | CRL - $8 \times 10^{-7}$ |
| Property 18: | HQ = 1 | CRL = $1 \times 10^{-5}$ |

This indicates that, if current and reasonably likely future uses were considered in the risk assessment (given the Borough of South Plainfield's promulgated redevelopment plans for this area), remediation of Properties 1 and 18 would not be warranted.

**EPA response**: The CDE facility is bounded by residential, commercial, and municipal properties. Based on the identified current and potential land uses and the most likely current and potential future land uses, the most likely current populations at risk of exposure are residents and commercial/municipal workers. Residential land use is most often associated with the greatest exposures based on frequency and duration that could result from current and future ingestion and direct contact with contaminated surface and subsurface soil. Therefore, the baseline risk assessment focused on health effects associated with a residential land use scenario, although there are residential, commercial, and municipal properties under evaluation. Evaluating a residential scenario was considered "reasonable maximum exposure", and therefore most protective of human health.

**c. Feasibility Study**

**Comment #14**: (Section 1.2.2.1) Insufficient information is provided regarding the use of the Hamilton Industrial Park after 1962 to assess other sources of contamination or site activities that could have contributed to potential transport of contamination to off-site locations. In particular, a truck driving school operated on the Hamilton Industrial Park site up until the mid-1990s and an auto junkyard was located between this property and Spicer Avenue during the early 1960s. Post-1962 aerial photographs suggest disturbance of the ground surface in the undeveloped portion of the Hamilton Industrial Park site (e.g., March 1969) .

**EPA response**: See EPA response to Comment B.2, above.

**Comment #15**: (Section 1.2.2.2) Insufficient information is provided regarding the history of the residential property development. In particular, sampling and removal action activities uncovered buried debris - how did this material come to be present on these properties? A review of aerial photographs suggests that some of the homes in this area are not the original structures on these properties - when were the current homes constructed?

**EPA response**: See EPA response to Comment B.3, above.

**Comment #16**: (Section 1.2.3.2) Three of the 19 properties sampled during the RI were determined to need remediation based [on] the findings of [the] baseline risk assessment. Additionally, 16 Right-of-Way (ROW) samples collected during the RI and Tier III removal action investigation (4 property ROWs sampled in May 1998) exhibiting PCB concentrations above the EPA Soil Screening Level (SSL) of 1 mg/kg were identified. EPA assumed an additional 25 properties will need to be sampled based on a location adjacent to ROWs with elevated PCB levels, and/or along major thoroughfares exiting the Site. It is unclear where these 25 properties are located and specifically how these properties were selected. The criteria for identifying these properties are fundamental to the remedy analysis and selection, and will ultimately be necessary for moving forward for remedy implementation.

**EPA Response**: Based on the investigations performed to date, EPA targeted approximately 59 properties where more extensive sampling is called for. These areas are identified in Appendix I,

Figure 5, of the Decision Summary. Figure 5 identifies the properties where additional testing is necessary because the curbside right-of-way sampling results exceeded EPA's Remediation Goal of 1 ppm and New Jersey's RDCSCC of 0.49 ppm.

**Comment #17**: (Section 1.2.4) The first paragraph of this section suggests that the principal transport mechanism that resulted in PCB contamination on off-site properties is via contaminated particulates (i.e., fugitive dust emissions) and/or transport by vehicles. However, deep soil contamination (e.g., below 1-foot) and evidence of fill material was also observed on sampled properties, which suggests that there are other/additional mechanisms by which contamination may be present on these properties (see Section 3.4.2). For example, the 1969 aerial photograph suggests disturbance of the ground surface in the undeveloped portion of the Hamilton Industrial Park site.

**EPA response**: See EPA response to Comment B.8, above.

**Comment #18**: (Section 1.2.5) The fourth paragraph summarizes the results of the human health risk assessment for Properties 1 and 18 based on an assumption of residential use of these properties. The RI Report acknowledges that current land uses will likely continue into the future. However, it is assumed for the human health risk assessment that all properties could be used for residential purposes. This contrarily assumes that current uses would change in the future. This assumption should be confirmed on a property-by-property basis before proceeding with remedial decision making. For example, both Property 1 and Property 18 are currently commercial-use properties, and given the Borough of South Plainfield's formally adopted commercial redevelopment plan for this area, it would appear extremely unlikely, as well as inconsistent with local redevelopment and land use planning, that these properties will be converted for residential in the future. If it is assumed that the current land uses will continue into the future, then the risks to indoor workers at the commercial properties would be lower than those calculated under a residential land use scenario, and as a result, Properties 1 and 18 would likely not be identified for remediation.

**EPA response**: See EPA response to Comment B.13, above.

**Comment #19**: (Section 2.4.3.5) The first two subsections discuss possible management of excavated soils as RCRA hazardous. Soils containing PCBs as the only contaminant are not RCRA regulated hazardous wastes. - Is there any evidence that the soil to be remediated will be characteristically hazardous under RCRA?

**EPA response**: Characterization will be performed during the remedial design and remedial action to determine if the excavated soil meets the definition of a characteristic hazardous waste pursuant to RCRA.

**Comment #20**: (Section 2.4.3.5.) Why are RCRA landfill requirements rather than TSCA landfill requirements discussed in this section?

**EPA response**: Both RCRA and TSCA landfill requirements were identified in this section to address contaminated soil at the affected properties.

**Comment #21**: (Section 2.4.3.5) How would PCB concentrations be used to determine the need for a RCRA Subtitle C landfill versus a TSCA landfill? A better comparison would be to assess the need for a Subtitle D landfill versus a TCSA landfill based on PCB concentrations.

**EPA response**: Soils disposed of off-site containing PCB concentrations greater than 50 ppm require disposal in a TSCA landfill. Based upon the data collected to date, most of the excavated soil is expected to be placed in a Subtitle D landfill.

**Comment #22**: (Section 2.4.3.5) The second two subsections discuss the possible management of excavated soils as non-hazardous/non-TSCA regulated. The assessment of these management options fails to consider the placement of non-hazardous/non-TSCA regulated soils on the Hamilton Industrial Park site. While this management approach was considered in terms of construction of a RCRA/TSCA landfill cell on the Hamilton Industrial Park Site (see first subsection), it is not considered as an option under the subsection entitled "On-site Non-Hazardous/Non-TSCA Disposal." Given the planned redevelopment of the Hamilton Industrial Park, site, these soils could be integrated into the grading associated with an on-site remedial option.

**EPA response**: The disposal. of non-hazardous/non-TSCA regulated soils excavated from nearby properties onto the industrial park was not evaluated since EPA has not selected a final remedy, or even completed the RI/FS, to address the contaminated soils at the industrial park. Thus, the viability of such an on-site remedial action is premature. EPA is aware that the Borough of South Plainfield has adopted a resolution, designating the Hamilton Industrial Park as a "Redevelopment Area".

**Comment #23**: (Section 3.2.2 and 3.2.3) Alternatives 2 and 3 incorporate the cleaning of the interiors of homes based on pre-design interior dust sampling.

What are the Remedial Action Objectives and PRGs for interior dust?

**EPA response**: The Remediation Goal for PCBs in interior dust is 1 ppm.

**Comment #24**: (Section 3.2.2 and 3.2.3) What are the remedial technologies considered for addressing the interiors of homes? What remedial technologies were screened to determine that these are effective technologies?

**EPA response**: Past removal actions have identified a number of successful remediation strategies that can be employed. The cleaning procedures to be employed where PCB-contaminated dust is encountered were selected based on EPA' s experience on performing indoor dust remediation at the Site, and will consist of: wiping down all horizontal exposed surfaces; vacuuming floors, drapes, upholstery, molding and window casings using HEPA

vacuums; washing all tile, linoleum and wood floors; steam cleaning or replacing carpets and area rugs; cleaning heating and cooling ducts; and cleaning or replacing all filters on air handling equipment.

**Comment #25**: (Section 4.2) What was the basis for assuming that 12 of the additional 25 properties (48%) to be investigated during the pre-design studies would need some remediation when only 3 of the 19, or 16%, sampled during RI were identified for remediation?

**EPA response**: EPA has conservatively estimated, based upon its experience with testing performed at properties nearby the CDE facility, that 12 out of the at least 59 properties (or approximately 20%) where additional soil sampling is called for will require remediation.

**Comment #26**: (Section 4.2) What is the basis for assuming that 7 additional properties would need interior dust cleaning?

**EPA response**: EPA has not identified a pattern to the indoor dust measurements. The seven additional properties that would require indoor dust remediation is an estimate based on EPA's experience at the site.

**Comment #27**: (Section 4.2) Was sampling of interiors performed during the RI?

**EPA response**: No additional sampling of interiors was performed by EPA during the RI.

**Comment #28**: (Section 4.2) What type of sampling [of interiors'] is proposed for the pre-design studies?

**EPA response**: Interior wipe and vacuum sampling will be performed.

**Comment #29**: (Section 4.2) What concentration will trigger the need for interior cleaning, and how will the effectiveness of the cleaning be determined?

**EPA response**: The Remediation Goal for PCBs in interior dust is 1 ppm. Post-cleaning indoor dust samples would be collected to determine the effectiveness of the cleaning.

**Comment #30**: (Section 4.2) Were the implementation risks associated with the transport of excavated soils along local roads quantified?

**EPA response**: These risks were evaluated and discussed in the "Short-term Effectiveness" section of the Proposed Plan and Record of Decision.

**Comment #31**: (Section 4.2) Why was an excavation depth of 2-feet assumed for any potential property excavations (i.e., those properties that are to be sampled during the pre-design studies) ? As reported in the Tier I Residential Property Removal Action Final Report (ENVIRON, July 1999) and Tier II Residential Property Removal Action Final Report (ENVIRON, January 2000),

most excavations conducted during the removal action program were 1-foot in depth or less.

**EPA response**: Although the excavation limits at most of the Tier I and Tier II properties were one foot in depth or less, some of these properties required excavation to a depth of several feet. Therefore, based on the. available data, for cost estimation purposes, EPA conservatively estimated that the additional properties will require excavation to a depth of two feet. However, additional sampling will be performed during the remedial design to define the actual excavation depths on each affected property and confirmatory sampling will ensure that the excavations have attained the Remediation Goal.

**Comment #32**: (Section 4.2) The following assumptions appear to be inconsistent with the general approach presented in Appendix C.

*Specific Excavation Area Comments:*

Area 1B: Sample RS01-04 is 1.2 mg/kg at 16-18", but the excavation is assumed to be a 1 foot depth (See Fig. C-l)

**EPA response**: Based on the data collected at this property, it is anticipated that the average excavation depth will be 1 foot. For example, although sample RS01-04 is 1.2 mg/kg at 16 to 18 inch, sample RS01-09 is 0.67 mg/kg at 0 to 2 inch. Furthermore, the excavation limits are estimates based on the data collected during the RI. Additional sampling will be performed during the remedial design to determine the actual depth of excavation. In addition, post-excavation sampling will be conducted to ensure that the cleanup goals are achieved.

**Comment #33**: (Section 4.2) Area 13A: only one of the two subsurface samples is greater than 1 mg/kg, yet the entire 756 sf area is assumed to be a 2 foot deep excavation (See Fig. C-2)

**EPA response**: The excavation limits are estimates based on the data collected during the RI. Additional sampling will be performed during the remedial design to determine the actual depth of excavation. In addition, post-excavation sampling will be conducted to ensure that the cleanup goals are achieved. As a result, the estimated volume of soil that requires excavation may be reduced or increased.

**Comment #34**: (Section 4.2) Area ISA: only one of the two subsurface samples is greater than 1 mg/kg, yet the entire 6,616 sf area is assumed to be a 2 foot deep excavation (See Fig. C-3)

**EPA response**: See EPA response to Comment B.33, above.

**Comment #35**: (Section 4.2) Cost Estimation: General: What is the basis for the cost to clean interiors of houses of $20,000/home (See Table B-2 and B-3) ?

**EPA Response**: This estimate is based on the actual costs incurred by EPA to clean the interiors of the Tier I and Tier II homes.

## C. WRITTEN COMMENTS RECEIVED DURING THE PUBLIC COMMENT PERIOD FROM THE SOUTH PLAINFIELD ENVIRONMENTAL COMMISSION

**Comment #1**: New Jersey Department of Environmental Protection's residential cleanup standard of 0.49 ppm is lower than US EPA's standard of 1 ppm. This difference is causing some uneasiness and an adversarial atmosphere that is unnecessary and could delay action. The Commission recommends that EPA work with the State to resolve the standards conflict before work begins. The Commission would like to see the properties cleaned to the level of the NJDEP's standard, and hopes that a means to achieve this can be found.

**EPA response**: EPA is using 1 ppm as its Remediation Goal for PCBs in this remedy and has no technical or legal basis to use 0.49 ppm. Based on the data collected to date, in meeting EPA's cleanup levels for PCBs, EPA believes the remedy may also achieve the New Jersey RDCSCC. If the remedy does not achieve the State RDCSCC, NJDEP may elect to pursue additional soil removal, or require that restrictions be placed on properties to prevent future direct contact with soils above 0.49 ppm. Furthermore, EPA does not believe that this approach would create any delay the implementation of the remedy.

**Comment #2**: Discovery of PCB contamination along the Borough's right of way suggests that contaminated dust has settled in the street. Spicer Avenue looks like a quiet, residential side street, but it is the main route to the Borough's solid waste and recycling facilities as well as. the ball fields. It is a heavily traveled road, and has been for decades. Passing vehicles probably have moved contaminated dust along the roadway. The Commission believes that EPA should include testing the stormwater catch basins in the sampling program. If, over the years, contaminated dust has been continually blown off-site onto the roadway, then it has been continually washed into the storm drains by rain. If there are significant PCB concentrations in the catch basins, they will serve as an ongoing source of PCB input into the Bound Brook. Although surface water will be addressed as part of OU3, the commission believes that sampling the catch basins are in the right of ways that will be resampled.

**EPA response**: During the remedial design, this recommendation will be evaluated.

# ATTACHMENT A

# PROPOSED PLAN

Superfund Program
Proposed Plan

U.S. Environmental Protection Agency, Region II

# Cornell-Dubilier Electronics Site

June 2003

## EPA ANNOUNCES PROPOSED PLAN

This Proposed Plan identifies the Preferred Alternative for the remedy to address contaminated soil at properties in the vicinity of the Cornell-Dubilier Electronics (CDE) facility and provides the rationale for this preference. The Preferred Alternative calls for the excavation and off-site disposal of soils contaminated with polychlorinated biphenyls (PCBs) on residential, commercial, and municipal properties nearby the CDE facility, and would be the final remedy for those properties. The preferred alternative would require an investigation of additional properties in the study area, during the remedial design, to determine if additional properties require remediation.

In 1997, EPA began collecting surface soil and interior dust samples from residential properties near the CDE facility. The results of the sampling revealed PCBs in soil and interior dust that posed a potential health concern for residents of several of the properties tested. These investigations led to removal actions at 13 residential properties, conducted from 1998 to 2000. Properties with PCBs in soil and interior dust that posed a potential health threat to residents were cleaned and contaminated soil was removed. In 2000, EPA expanded the investigation and began collecting soil samples from properties further from the CDE facility. This sampling revealed 3 additional properties with PCBs in soil that pose a potential health threat to residents. In addition, the sampling revealed that there are some properties where more extensive sampling is called for. Based upon EPA's experience with testing performed at properties nearby the CDE facility, EPA has conservatively estimated that additional sampling is expected to identify up to 12 affected properties that will require soil cleanup or that will require interior dust remediation because of elevated PCB levels. A projected 2,100 cubic yards of contaminated soil would be excavated from the properties requiring soil cleanup. The additional sampling would typically be performed on properties where right-of-way sampling revealed elevated levels of PCBs, however, there was insufficient data to determine whether or not remediation is required. The sampling would include exterior soils and the collection of dust samples from the interior of homes. Based on the investigations performed to date, EPA has targeted at least 59 properties where additional soil sampling is called for. EPA's estimate of approximately 12 affected properties is based upon EPA's experience with testing performed at properties nearby the CDE facility and an analysis of the existing data to predict how many additional affected properties will be found by further investigations. In addition to these newly identified properties, EPA's proposed remedy would re-evaluate the removal actions already conducted at 13 residences, to insure that those cleanups are protective, and take additional remedial actions at those properties, if warranted.

The Proposed Plan includes summaries of all the cleanup alternatives evaluated for use at these properties. This document is issued by the U.S. Environmental Protection Agency (EPA), the lead agency for site activities, and the

Dates to remember:
**MARK YOUR CALENDAR**

**PUBLIC COMMENT PERIOD:**
**June 16 - July 16, 2003**
U.S. EPA will accept written comments on the Proposed Plan during the public comment period.

**PUBLIC MEETING:**
**June 23, 2003**
U.S. EPA will hold a public meeting to explain the Proposed Plan and all of the alternatives presented in the Feasibility Study. Oral and written comments will also be accepted at the meeting. The meeting will be held at Borough Hall, 2480 Plainfield Avenue, South Plainfield, New Jersey at 7:00 p.m.

**For more information, see the Administrative Record at the following locations:**

U.S. EPA Records Center, Region II
290 Broadway, 18th Floor.
New York, New York 10007-1866
(212)-637-3261
Hours: Monday-Friday - 9 am to 5 pm

South Plainfield Library
2484 Plainfield Avenue
South Plainfield, New Jersey 07080
(908) 754-7885
Hours:
Monday, Wednesday, and Thursday - 10 am to 9 pm
Tuesday and Friday - 10 am to 6 pm

New Jersey Department of Environmental Protection (NJDEP), the support agency. EPA, in consultation with NJDEP, will select a final soil remedy for these properties after reviewing and considering all information submitted during the 30-day 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. A final remedy to address the facility soils, facility buildings, groundwater, and the Bound Brook will be presented in future Proposed Plans and Records of Decision (RODs).

EPA is issuing this Proposed Plan as part of its community relations program under Section 117(a) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA, or Superfund). This Proposed Plan summarizes information that can be found in greater detail in the CDE Remedial Investigation and Feasibility Study (RI/FS) reports and other documents contained in the Administrative Record file for this site. EPA and NJDEP encourage the public to review these documents to gain a more comprehensive understanding of the site and Superfund activities that have been conducted at the site.

## SITE HISTORY

The CDE facility is located at 333 Hamilton Boulevard in South Plainfield, Middlesex County, New Jersey. The fenced 26-acre facility is bounded on the northeast by the Bound Brook and the former Lehigh Valley Railroad, Perth Amboy Branch (presently Conrail); to the southeast by the Bound Brook and the South Plainfield Department of Public Works property; to the southwest, across Spicer Avenue, by single-family residential properties; and to the northwest, across Hamilton Boulevard, by mixed residential and commercial properties (see Figure 1). CDE operated at the facility from 1936 to 1962, manufacturing electronic components, including capacitors. It is reported that CDE also tested transformer oils at the facility. It is alleged that during its operations, CDE dumped or buried PCB-contaminated materials and other hazardous substances directly on the facility soils. These activities led to widespread chemical contamination at the facility, as well as migration of contaminants to areas adjacent to the facility. PCBs have been detected in the groundwater, soils and in building interiors at the industrial park, at adjacent residential, commercial, and municipal properties and in the surface water and sediments of the Bound Brook. The facility, currently known as the Hamilton Industrial Park, consists of 18 buildings and is occupied by several commercial businesses. Since 1962, over 100 companies have operated at the facility as tenants.

In June 1994, at the request of NJDEP, soil, surface water and sediments at the facility were sampled and analyzed by EPA. The results of the sample analyses revealed that elevated levels of PCBs, volatile organic compounds (VOCs), and inorganics were present at the site.

As a result of the contamination found at the facility, EPA ordered the owner of the facility property, D.S.C. of Newark Enterprises, Inc. (DSC), a potentially responsible party (PRP), to perform a removal action in 1997 to mitigate risks associated with contaminated soil and surface water runoff from the facility. The removal action included paving driveways and parking areas in the industrial park, installing a security fence, and implementing drainage controls.

In October and November 1997, EPA collected soil and interior dust samples from residential properties on Spicer Avenue, near the industrial park. EPA and the Agency for Toxic Substances and Disease Registry (ATSDR) reviewed the data obtained from this sampling and concluded that exposure to PCBs in dust and soil posed a potential health concern for residents of several of the properties tested. To limit the potential for exposure to PCBs until a final remedy could be selected, EPA initiated another removal action to clean the interiors of seven homes on Spicer Avenue, Garibaldi Avenue, and Hamilton Boulevard. EPA performed interior cleaning on seven properties, and ordered a group of PRPs for the site to remove contaminated soil from six properties. Interior dust remediation was completed in April 1998, and removal of PCB-contaminated soil was completed in September 1999.

Because of contamination found on residential properties in 1997, in 1998, EPA expanded its investigation to Delmore Avenue and Hamilton Boulevard near the industrial park. Again, PCBs were found in dust and soil that posed a potential health concern for residents. EPA cleaned the interiors of eight homes on Delmore Avenue and Hamilton Boulevard, and ordered the PRPs to remove contaminated soil from seven properties. This second group of removal actions was completed in January 2000, limiting the potential for exposure until a final remedy could be selected.

In July 1998, EPA included the CDE site on its National Priorities List.

In 1999, EPA conducted a preliminary investigation of the Bound Brook to evaluate the potential impacts of contamination on human health and the environment. Elevated levels of PCBs were found in fish and sediments of the Bound Brook. As a result of these investigations, NJDEP issued a fish consumption advisory for the Bound Brook and its tributaries, including New Market Pond and Spring Lake.

## ENFORCEMENT

PRPs for the site include Cornell-Dubilier Electronics Corporation (CDE), Dana Corporation, Dana Corporation Foundation, and Federal Pacific Electric Company. In addition, DSC, the current owner of the Hamilton Industrial Park, has been named as a PRP. Four administrative orders have been issued to perform portions of the removal actions required at the site. The first administrative order to DSC, issued in 1997, required the installation and maintenance of site stabilization measures to limit the movement of contaminants from the industrial park. These actions included paving driveways and parking areas in the industrial park, installing a security fence and implementing drainage controls.

In 1998 and 1999, administrative orders addressed soil removal work from six properties on Spicer Avenue (referred to by EPA as the "Tier I" properties), and from seven properties on Delmore Avenue and Hamilton Boulevard (referred to by EPA as Tier II), respectively. DSC and Cornell-Dubilier Electronics signed on to the 1998 administrative order and Dana Corporation and Cornell-Dubilier Electronics signed on to the 1999 administrative order. EPA also issued a participate and cooperate order in 1999 to Federal Pacific Electric and DSC for the Tier II properties. In April 2000, EPA ordered DSC to remove PCB-contaminated soil from one additional property on Spicer Avenue. DSC agreed to perform the work required under the order, but failed to do so. EPA now plans to undertake this removal action later this year.

In July 1998, EPA offered the PRPs an opportunity to perform to perform a comprehensive study of the site, called a Remedial Investigation and Feasibility Study (RI/FS), to help determine the nature and extent of contamination. After efforts to agree on the scope of the remedial investigation required at the site were unsuccessful, EPA elected to perform the RI/FS using federal funds.

In 2000, CDE and Dana Corporation initiated discussions with the Borough of South Plainfield regarding the future redevelopment of the Hamilton Industrial Park, and how that redevelopment might be accomplished as part of a remedy for the facility soils and buildings. EPA is participating in this future-use planning for the facility as part of a future FS.

## SITE CHARACTERISTICS

To expedite the cleanup of the CDE site, EPA has divided the site into remedial action phases or operable units (OUs). Operable Unit 1 (OU1) addresses residential, commercial, and municipal properties in the vicinity of the CDE facility. The second operable unit (OU2) will address the remediation of source materials, including contaminated facility soils and buildings. The third and final operable unit (OU3) will address the contaminated groundwater and contaminated sediments at the Bound Brook.

### Sampling Approach

EPA targeted a group of 19 residential, commercial, and municipal properties in the vicinity of the CDE facility for extensive surface and subsurface PCB testing. Some of these 19 properties were in areas where previous testing had indicated a higher likelihood of finding elevated PCB levels, while others were in areas further from the facility, where no elevated PCB levels were anticipated.

EPA also collected samples along the curb-side right-of-ways in areas around the CDE facility, to provide a broader scope to the investigation and identify PCB distribution trends that would not be found by sampling individual properties. During the earlier removal investigations, EPA had performed curb-side surveys of Delmore, Arlington, Hancock and Belmont Avenues (referred to by EPA as Tier III). The Tier III curb-side survey consisted of 74 surface soil samples. Only 9 samples were found with concentrations of PCBs in excess of EPA's Soil Screening Level for direct ingestion and dermal contact of 1 part per million (ppm).

During the summer of 2000, EPA collected samples at 807 locations as part of the OU1 RI. In addition to the 19 targeted properties, the curb-side sampling was expanded in the RI to the right-of-ways of 13 roadways in the vicinity of the CDE facility, including public right-of-ways within the Bound Brook flood plain, located downstream (northwest) of the CDE facility. Only 25 of the 807 RI samples were found with concentrations of PCBs in excess of EPA's 1 ppm Soil Screening Level. The soil remedial investigation indicated the following:

**Surface Contamination**

- Of the 74 Tier III surface soil samples collected prior to the start of the RI, PCB concentrations ranged from 0.022 ppm to 2.9 ppm. Of these 74 samples, only 9 samples exceeded the EPA Soil Screening Level of 1 ppm total PCBs.

- Of the 630 surface soil samples collected during the RI, PCB concentrations ranged from non-detect to 57 ppm. Of these 630 samples, only 20 samples exceeded the EPA Soil Screening Level of 1 ppm total PCBs.

**Subsurface Contamination**

- Of the 177 subsurface soil samples collected at 16 to 18-inches below ground surface, only five samples exceeded the EPA Soil Screening Level of 1 ppm total PCBs. Concentrations in three of the five samples had an average of 1.3 ppm, and the fourth and fifth samples had concentrations of 44 ppm and 310 ppm.

**Results from the 19 Targeted Properties**

- Eighteen of the 25 RI samples found with concentrations of PCBs in excess of EPA's Soil Screening Level of 1 ppm were found during this phase of the investigation. Of the 19 properties surveyed (approximately 20 samples per property), only three properties were identified with elevated levels of PCBs in soil that might pose a risk to human health or the environment.

**Results from the Curbside Right-of-Way Sampling**

- Seven of the 25 RI samples found with concentrations of PCBs in excess of EPA's Soil Screening Level of 1 ppm were found during this phase of the investigation. Right-of-way sampling indicated more frequent detections on blocks nearer the CDE facility and on high-traffic streets like Hamilton Boulevard and New Market Avenue. These data trends support a pattern of wind-blown or vehicle-carried contamination from the facility.

**Bound Brook Floodplain Property Sampling**

- None of the 174 surface and subsurface soil samples collected from residential properties and public right-of-ways within the Bound Brook floodplain, located downstream (northwest) of the CDE facility, exceeded the EPA Soil Screening Level of 1 ppm total PCBs.

**Additional Data Needs**

The majority of the PCB measurements detected during the RI were in the surface samples, collected in the first few inches of soil. EPA analyzed data from the RI and the earlier removal investigations, and has targeted at least 59 properties where additional soil sampling is called for. Figure 2 illustrates the study area where additional testing is necessary. Figure 3 identifies the locations of curbside right-of-way sampling that exceed EPA's Soil Screening Level of 1 ppm and the NJDEP's criteria of 0.49 ppm. Based upon EPA's experience with the testing performed to date, EPA has conservatively estimated that approximately 12 properties would be identified with at least some elevated PCB levels during these expanded property investigations.

In addition, during earlier removal activities, PCBs were measured in residential indoor dust, though the dust measurements were sporadic in nature and not necessarily correlated with higher levels of PCBs in surface soils. Unlike the soil sampling analysis described above, EPA has not identified a pattern to the indoor dust measurements, though additional indoor dust testing for PCBs is called for. EPA anticipates that the dust sampling would be performed on a subset of the 59 properties identified for soil sampling. EPA has conservatively estimated that up to seven additional properties will be identified with elevated PCBs in indoor dust during these expanded property investigations.

The number of affected properties, referenced in this Proposed Plan with elevated levels of PCBs, is an estimate used to calculate the approximate costs of the cleanup alternatives. The precise number of properties that would require either soil remediation or interior cleaning under this proposed OU1 remedy would be determined upon the completion of the additional sampling.

## SCOPE AND ROLE OF THE ACTION

As previously stated, this Proposed Plan discusses the preferred alternative for addressing PCB-contaminated soils at residential, commercial, and municipal properties in the vicinity of the CDE facility that are above EPA's acceptable risk range. Future Proposed Plans will address other contamination problems posed by the site. EPA's remedial investigations of the facility soil and buildings contamination, the groundwater, and sediment contamination are ongoing. EPA plans to complete an OU2 RI/FS for the facility soils and buildings in 2003. EPA's findings to date indicate the presence of "principal

threat" wastes on the facility. No principal threat wastes were identified at the OU1 residential, commercial, and municipal properties.

**WHAT IS A "PRINCIPAL THREAT"?**

The NCP establishes an expectation that EPA will use treatment to address the principal threats posed by a site wherever practicable (NCP Section 300.430(a)(1)(iii)(A)). The "principal threat" concept is applied to the characterization of "source materials" at a Superfund site. A source material is material that includes or contains hazardous substances, pollutants or contaminants that act as a reservoir for migration of contamination to groundwater, surface water or air, or acts as a source for direct exposure. Contaminated groundwater generally is not considered to be a source material; however, Non-Aqueous Phase Liquids (NAPLs) in groundwater may be viewed as source material. Principal threat wastes are those source materials considered to be highly toxic or highly mobile that generally cannot be reliably contained, or would present a significant risk to human health or the environment should exposure occur. The decision to treat these wastes is made on a site-specific basis through a detailed analysis of the alternatives using the nine remedy selection criteria. This analysis provides a basis for making a statutory finding that the remedy employs treatment as a principal element.

## SUMMARY OF SITE RISKS

As part of the RI/FS, EPA conducted a baseline risk assessment to estimate the current and future effects of contaminants on human health and the environment. A baseline risk assessment is an analysis of the potential adverse human health and ecological effects caused by hazardous substance release from a site in the absence of any actions or controls to mitigate these under current and future land uses. The CDE facility is bounded by residential, commercial, and municipal properties. Based on the identified current and potential future land uses, the most likely current populations at risk of exposure are residents and commercial/municipal workers. Residential land use is most often associated with the greatest exposures based on frequency and duration that could result from current and future ingestion and direct contact with contaminated surface and subsurface soil. Therefore, the baseline risk assessment focused on health effects to residential land use scenario, although there are residential, commercial, and municipal properties under evaluation. Evaluating a residential scenario was considered "reasonable maximum exposure," and therefore most protective of human health.

### Human Health Risks

EPA has promulgated requirements for the management of PCB wastes as directed by Toxic Substances Control Act (TSCA), and these TSCA requirements would be applicable to the management of PCB contamination at this site. These requirements provide a risk-based approach for managing PCB wastes. Consistent with this risk-based approach, EPA conducted a baseline risk assessment, as part of the RI/FS, for residential, commercial, and municipal properties in the vicinity of the CDE facility to determine the current and future effects of PCBs on human health. In conducting the risk assessment, a preliminary remediation goal (PRG) of 1 ppm for soils was selected based on the August 1990 guidance, entitled "A guide on Remedial Actions at Superfund Sites with PCB Contamination" and a cleanup level of 1 ppm was selected. The cleanup level of 1 ppm is within EPA's protective risk range of $10^{-4}$ to $10^{-6}$. For known or suspected carcinogens, EPA has established an acceptable cancer risk range of one-in-a million ($1 X10^{-6}$) to one-in-ten thousand ($1 X 10^{-4}$). Action is generally warranted when excess lifetime cancer risk exceeds one-in-ten thousand. In other words, for every 10,000 people exposed under the assumptions used in the risk assessment, one additional cancer *may* occur as a result of exposure to the PCB-contaminated soils.

PCBs were identified as the contaminant of concern in previous investigations that started in 1994. The baseline risk assessment focused on health effects for both young children (up to 6 years old) and adults, in a residential setting, that could result from current and future direct contact with contaminated soil, such as incidental ingestion and dermal contact.

The soil samples collected from the residential, commercial, and municipal properties in the vicinity of the CDE facility were analyzed for PCBs. PCBs were analyzed using EPA's standard sampling methodology that identifies PCBs in the environment as Aroclors. "Aroclor" is the trade name given to commercially manufactured mixtures of PCBs. The different mixtures are identified with a four digit number (e.g., Aroclor-1254). Aroclors were chosen for evaluation because they were used in the former manufacturing processes at the CDE facility and are bioaccumulative and persistent in the environment. The Aroclors detected at the properties in the vicinity of the CDE facility are Aroclor-1254 and Aroclor-1260.

In the baseline risk assessment, surface soil, as well as subsurface soil, were examined to determine the cancer risk and non-cancer health hazards associated with exposure to PCBs on each of the properties sampled.

Results of the risk assessment indicate that the cancer risk estimates for adult and young child residents was above the risk range at one property ( $9.2 x10^{-5}$ for adults and $2 x10^{-4}$ for the young child).

For the evaluation of non-cancer human health hazards, three properties exceeded EPA's target hazard index of 1. The hazard indices were 56, 2.8, and 2.4 for the young child and 6.7, less than 1, and less than 1 for the adult at the individual properties, respectively. These cancer risks and non-cancer hazard levels indicate that there is a potential cancer risk and non-cancer health hazard to children and adults from direct exposure to contaminated surface and subsurface soil at these three properties. 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 surface and subsurface soils, as well as the toxicity of PCBs.

It is EPA's current judgment that the Preferred Alternative identified in this Proposed Plan, or one of the other active measures considered in the Proposed Plan, is necessary to protect human health or welfare or the environment from actual or threatened releases of hazardous substances into the environment.

**WHAT ARE THE "CONTAMINANTS OF CONCERN"?**

The contaminant of concern at the residential, commercial, and municipal properties in the vicinity of the Cornell-Dubilier Electronics facility is polychlorinated biphenyls (PCBs).

**PCBs:** PCBs is the contaminant that drives the soil risk. PCBs were detected on residential, commercial, and municipal properties in the vicinity of the CDE facility in soil (0 to 2 inches below ground surface) at (non detect, 44 ppm; minimum, and maximum, respectfully). In deeper subsurface soil samples (16 to 18 inches below ground surface), it was detected at (non detect, 310 ppm; minimum and maximum, respectfully).

PCBs were widely used as a fire preventative and insulator in the manufacture of transformers, capacitors, and other electrical equipment because of their ability to withstand exceptionally high temperatures. The manufacture of PCBs stopped in the United States in 1977.

EPA has determined that PCBs cause cancer in animals and probably cause cancer in humans. Serious non-cancer health effects have been observed in animals exposed to PCBs. Studies of Rhesus monkies exposed to PCBs indicate a reduced ability to fight infection and reduced birth weight in offspring exposed in utero.

### Ecological Risks

A four-step process is utilized for assessing site-related ecological risks for a reasonable maximum exposure scenario: *Problem Formulation*—a qualitative evaluation of contaminant release, migration, and fate; identification of contaminants of concern, receptors, exposure pathways, and known ecological effects of the contaminants; and selection of endpoints for further study. *Exposure Assessment*—a quantitative evaluation of contaminant release, migration, and fate; characterization of exposure pathways and receptors; and measurement or estimation of exposure point concentrations. *Ecological Effects Assessment*—literature reviews, field studies, and toxicity tests, linking contaminant concentrations to effects on ecological receptors. *Risk Characterization*—measurement or estimation of both current and future adverse effects.

An ecological risk assessment (ERA) was performed for the surface soils at properties in the vicinity of the CDE facility. The objective of the ERA was to assess potential risks to terrestial receptors from contaminants found on these properties. Based on the ERA, PCB-contaminated soils at these properties represent low potential risks to wildlife species, due to the lack of significant habitat at most of the off-site properties. An ERA for the CDE facility is being conducted as part of the later operable units (OU2 and OU3) that include surface water and associated wetlands.

## REMEDIAL ACTION OBJECTIVES

The following remedial action objectives for contaminated soil address the human health risks and environmental concerns at residential, commercial, and municipal properties in the vicinity of the CDE facility:

Reduce or eliminate the direct contact threat associated with contaminated soil to levels protective of current land use and considering the future residential use; and

prevent exposure and minimize disturbance to the surrounding community of South Plainfield, during implementation of the remedial action.

**SUMMARY OF SOIL REMEDIAL ALTERNATIVES**

| Medium | Source Control Alternatives | Description |
|---|---|---|
| SOIL | SC-1 | No Action |
| | SC-2 | Limited Action; Engineering and Institutional Controls |
| | SC-3 | Excavation; Off-Site Disposal with Treatment (if necessary) |

EPA's August 1990 guidance, entitled "A guide on Remedial Actions at Superfund Sites with PCB Contamination", recommends a cleanup goal of 1 ppm for unrestricted residential land use, and EPA is using 1 ppm as its preliminary remediation goal (PRG) in this Proposed Plan. The State of New Jersey has developed a State-wide residential soil cleanup criteria for PCBs of 0.49 ppm. Based on the data collected to date, in meeting EPA's cleanup levels for PCBs, EPA believes the remedy may also achieve the State of New Jersey residential direct contact soil cleanup criteria. Sampling collected as part of the RI and previous removal curbside right-of-way investigations indicate that 34 samples exceeded EPA's PRG, and 59 additional samples exceeded the NJDEP's criteria of 0.49 ppm. If the remedy does not achieve the State residential direct contact cleanup criteria of 0.49 ppm for PCBs, the State may elect to pursue additional soil removal, or require that restrictions be placed on properties to prevent future direct contact with soils above 0.49 ppm.

## SUMMARY OF REMEDIAL ALTERNATIVES

Remedial Alternatives for OU1 soils are presented below. CERCLA requires that if a remedial action is selected that results in hazardous substances, pollutants, or contaminants remaining at the site above levels that allow for unlimited use and unrestricted exposure, EPA must review the action no less often than every five years after initiation of the action. In addition, institutional controls (*e.g.*, a deed notice in the form of an easement or covenant) to limit the use of portions of the property may be required. These use restrictions are discussed in each alternative as appropriate. The type of restriction and enforceability will need to be determined after completion of the remedial alternative selected in the ROD. Consistent with expectations set out in the Superfund regulations, none of the remedies rely exclusively on institutional controls to achieve protectiveness. The time frames below for construction do not include the time for remedial design or the time to procure contracts.

The remedial alternatives evaluated in this Proposed Plan were limited for several reasons. This is a well-established, primarily residential neighborhood, and space is limited; consequently, on-site remedies that involve treatment or containment (such as creating a disposal cell for the soil in the area) were not considered. In addition, since no principal threat wastes are associated with OU1 and the contaminant concentrations are relatively low, treatment of the contaminated soil was not considered as a principal element of any alternative.

The remedial alternatives would require an investigation of additional properties in the study area, during the remedial design, to determine if additional properties require remediation. The additional sampling would typically be performed on properties where right-of-way sampling revealed elevated levels of PCBs, however, there was insufficient data to determine whether or not remediation is required. The sampling would include exterior soils and the collection of dust samples from the interior of homes. Based on the investigations performed to date, EPA has targeted at least 59 properties where additional soil sampling is called for. EPA's estimate of approximately 12 affected properties is based upon EPA's experience with testing performed at properties nearby the CDE facility and an analysis of the existing data to predict how many additional affected properties will be found by further investigations. The active remedial alternatives would also call for a re-evaluation of the 13 residential properties where removal actions have already been performed, to assure that those cleanups are consistent with the selected remedy.

**Alternative 1: No Action**

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

Regulations governing the Superfund program generally require that the "no action" alternative be evaluated to establish a baseline for comparison. Under this alternative, EPA would take no action at these properties to prevent exposure to the soil contamination and the contaminated soil would be left in place. Because contaminated soil would be left in place under this alternative, a review of the remedy every five years would be required.

**Alternative 2: Limited Action; Engineering and Institutional Controls**

*Estimated Capital Cost:* *$520,000*
*Estimated Annual O&M Cost:* *$20,000*
*Estimated Present Worth Cost:* *$770,000*
*Estimated Construction Time frame: 3 to 6 months*

The Limited Action alternative would provide minimal engineering and institutional controls to prevent exposure to PCB-contaminated soils. Capping would be performed

to minimize exposure to PCB-contaminated soil. The areas to be capped for each property would limit exposure to PCBs at concentrations greater than 1 ppm. Controls would also include implementation of deed notices or restrictions to limit future use of the properties, implementation of public awareness programs, and five-year reviews to assess the need for future remedial actions.

Sealing or other engineering controls to prevent direct contact or inhalation of PCB-contaminated indoor dust is not feasible in a residential setting. Therefore, this alternative would include indoor dust remediation where PCB-contaminated dust is encountered. Remediation of the interior of homes includes the cleaning of homes where health concerns or potential health concerns exist and the temporary relocation of residents during the cleaning. The cleaning procedures to be employed include: wiping down all horizontal exposed surfaces; vacuuming floors, drapes, upholstery, molding and window casings using HEPA vacuums; washing all tile, linoleum and wood floors; steam cleaning or replacing carpets and area rugs; cleaning heating and cooling ducts; and cleaning or replacing all filters on air handling equipment.

Post-cleaning indoor dust samples would be collected to determine the effectiveness of the cleaning.

Because PCB-contaminated soil would be left in place as part of Alternative 2, review of the remedy every five years would be required.

**Alternative 3: Excavation; Off-Site Disposal with Treatment**

*Estimated Capital Cost:* *$760,000*
*Estimated Annual O & M Cost:* *$0*
*Estimated Present Worth Cost:* *$760,000*
*Estimated Construction Time frame: 12 months*

This alternative includes the excavation of an estimated 2,100 cubic yards of PCB-contaminated soil and off-site disposal at a Resource Conservation and Recovery Act (RCRA) or Toxic Substances Control Act (TSCA) regulated landfill, as appropriate, based on the concentrations of PCBs in the excavated soils. If necessary, in order to meet the requirements of the disposal facilities, treatment of the soil may be performed using any of the technologies identified in the Feasibility Study. Under this alternative, PCB-contaminated soil found at properties in excess of the PRG would be excavated for off-site disposal. Once excavation activities have been completed, clean soil will be used as backfill. Based upon EPA's experience with testing performed at properties nearby the CDE facility, EPA has conservatively estimated that the additional sampling is expected to identify up to 12 affected properties. An estimated 2,100 cubic yards of contaminated soil would be excavated from the properties requiring soil cleanup. To date, four properties have been identified that would require remediation under this alternative: three properties that were identified in the RI investigation, and one property that was identified during the earlier removal action investigation. This one property did not require an immediate response under EPA's removal action authority, but would be addressed under this final remedy. The locations of the four properties that would require remediation are identified on Figure 2. The properties include a single-family home, an automotive repair station, a construction company office, and a former day care center. This alternative would include an investigation of the study area, during the remedial design, to determine if additional properties require remediation. The sampling would include exterior soils and the collection of dust samples from the interior of homes. The sampling would be performed in accordance with NJDEP requirements, including the sampling protocols identified in N.J.A.C. 7:26:E.

This alternative would also include indoor dust remediation where PCB-contaminated dust is encountered. Remediation of the interior of homes includes the cleaning of homes where health concerns or potential health concerns exist and the temporary relocation of residents during the cleaning. The cleaning procedures to be employed include: wiping down all horizontal exposed surfaces; vacuuming floors, drapes, upholstery, molding and window casings using HEPA vacuums; washing all tile, linoleum and wood floors; steam cleaning or replacing carpets and area rugs; cleaning heating and cooling ducts; and cleaning or replacing all filters on air handling equipment.

Post-cleaning indoor dust samples would be collected to determine the effectiveness of the cleaning.

## EVALUATION OF ALTERNATIVES

Nine criteria are used to evaluate the different remediation alternatives individually and against each other in order to select an alternative. This section of the Proposed Plan profiles the relative performance of each alternative against the nine criteria, noting how it compares to the other

options under consideration. The nine evaluation criteria are discussed below. The "Detailed Analysis of Alternatives" can be found in the FS.

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

All of the alternatives except Alternative 1 (No Action) would provide adequate protection of human health and the environment by eliminating, reducing, or controlling risk through off-site disposal/treatment, engineering controls, and/or institutional controls. Alternative 2 would provide some protection to property owners/occupants from future exposure to contaminated soils through the placement of cover material, and through institutional controls such as land-use restrictions and public education. However, contaminated soils would remain in place above the cleanup goals.

Alternative 3 (excavation and off-site disposal) would remove soil with PCB concentrations above the PRG and, therefore, would protect both human and environmental receptors from contact with contaminants in the soil.

There would be no local human health or environmental impacts associated with off-site disposal because the contaminants would be removed from the site to a secure location. Alternative 3 would eliminate the actual or potential exposure of residents to contaminated soils.

2. **Compliance with ARARs**

Actions taken at any Superfund site must meet all applicable or relevant and appropriate requirements (ARARS) of federal and state law or provide grounds for invoking a waiver of these requirements. These include chemical-specific, location-specific, and action-specific ARARs. There are no chemical-specific ARARs for the contaminated soils. EPA's August 1990 guidance, entitled "A guide on Remedial Actions at Superfund Sites with PCB contamination" recommends a cleanup goal of 1 ppm for unrestricted residential land use and EPA is using 1 ppm in this Proposed Plan. The State of New Jersey has developed a State-wide residential soil cleanup criteria for PCBs of 0.49 ppm, which is a "To Be Considered" criterion. Alternative 1, No Action, would not achieve either the PRG or the State's slightly lower cleanup criterion. Alternatives 2 and 3 would prevent direct contact with PCB-contaminated soil in excess of the PRG. On properties where the State criterion is not achieved, NJDEP may elect to take additional actions to meet its more stringent standard.

The Resource Conservation and Recovery Act and the Toxic Substances Control Act are federal laws that mandate procedures for managing, treating, transporting, storing, and disposing of hazardous substances. All portions of RCRA that are applicable or relevant and appropriate to the proposed remedy for the site would be met by Alternatives 1 through 3 and all portions of TSCA would be met by Alternatives 2 and 3.

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

Alternative 1 (No Action) provides no reduction in risk. Alternative 2 would not be permanent or as effective over the long term, since deed restrictions may not reliably reduce future health risks to property owners/occupants associated with exposure to contaminated surface soils. In contrast, under Alternative 3, long-term risks would be removed, since contaminated soils would be permanently removed. Off-site treatment/disposal at a secure, permitted hazardous waste facility for the contaminated soil is reliable because the design of these types of facilities includes safeguards and would ensure the reliability of the technology and the security of the waste material.

4. **Reduction of Toxicity, Mobility, or Volume of Contaminants Through Treatment**

Alternative 1 (No Action) would not achieve any reduction in the toxicity, mobility, or volume of contaminated soil, since the soil would remain in place. Alternative 2 (Limited Action) would reduce the mobility of contaminants through capping, but would not reduce the volume or toxicity. Alternative 3 (Excavation) would reduce contaminant mobility through removal and disposal of the soils at an approved off-site disposal facility. Furthermore, off-site treatment, when required, would reduce the toxicity and volume of the contaminated soils prior to land disposal. Soils with PCB concentrations less than 50 ppm would be excavated and transported to a RCRA landfill permitted to accept low levels of PCB waste. Soils with PCB concentrations between 50 and 500 ppm would be excavated and transported to a TSCA landfill without treatment. It is anticipated that hazardous material would not be destroyed under Alternative 3, unless the disposal facility required treatment prior to landfilling.

5. **Short-term Effectiveness**

No short-term adverse impacts to the community would be

expected for Alternative 1 (No Action). Minimal impacts would be expected for Alternative 2 since contaminated soils would not be significantly disturbed during cap construction. Alternative 3, however, presents a higher short-term risk because of the greater potential for exposure associated with excavation and transportation of contaminated soils.

Alternative 3 would also cause an increase in truck traffic, noise and potentially dust in the surrounding community, as well as potential impacts to workers during the performance of the work. These potential impacts would be created through construction activities and exposure to the contaminated soil being excavated and handled. However, proven procedures including engineering controls, personnel protective equipment and safe work practices would be used to address potential impacts to workers and the community. For example, the work would be scheduled to coincide with normal working hours (e.g., 8 a.m. to 5 p.m. on week days and no work on weekends or holidays). In addition, trucking routes with the least disruption to the surrounding community would be utilized. Appropriate transportation safety measures would be required during the shipping of the contaminated soil to the off-site disposal facility.

No environmental impacts would be expected from Alternative 1. The risk of release during implementation of Alternatives 2 and 3 is principally limited to wind-blown soil transport or surface water runoff. Any potential environmental impacts associated with dust and runoff would be minimized with proper installation and implementation of dust and erosion control measures and by performing the excavation and off-site disposal with appropriate health and safety measures to limit the amount of material that may migrate to a potential receptor.

No time is required for implementation of Alternative 1 (No Action). Time required for implementation of Alternative 2 (Limited Action) is estimated to take three to six months. Alternative 3 (Excavation) is estimated to take about 12 months to implement.

These time frames do not take into account the performance of additional property investigations, to identify other contaminated properties, that would be required under Alternatives 2 and 3. These investigations would be performed during remedial design, and may add up to one year to the typical remedial design time frame of 15 to 18 months. However, the additional investigative work will be performed concurrently with the known contaminated properties so that the work is streamlined.

### 6. Implementability

No technical implementability concerns exist for any of the three alternatives. However, the development of protective engineering and institutional controls, pursuant to Alternative 2, that would be both enforceable and acceptable to the private property owners is in question. All technical components of Alternatives 2 and 3 would be easily implemented using conventional construction equipment and materials. The personnel required to operate the heavy equipment would require appropriate Occupational Safety and Health Administration (OSHA) certifications (e.g., hazardous waste worker), in addition to being certified in the operation of heavy equipment. Such individuals are readily available. Use of off-site hazardous and non-hazardous treatment/disposal facilities for the disposal of the contaminated soils are available and would be feasible.

### 7. Cost

The estimated present worth cost of Alternative 1 (No Action) is $0. Alternative 2 (Limited Action) has an estimated present worth cost of $770,000 and Alternative 3 has a present worth cost of $760,000.

### 8. State/Support Agency Acceptance

The State of New Jersey does not concur with EPA's PRG of 1 ppm for PCBs in soil. However, the State of New Jersey agrees with the preferred alternative 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 Record of Decision, the document that formalizes the selection of the remedy, for the site.

## SUMMARY OF THE PREFERRED ALTERNATIVE

The preferred alternative for cleaning up soils at residential, commercial, municipal properties in the vicinity of the CDE facility is Alternative 3 (Excavation; Off-Site Disposal), hereafter referred to as the Preferred Alternative. The Preferred Alternative includes excavation, transportation and disposal, with treatment as necessary, of an estimated 2,100 cubic yards of contaminated soil and interior cleaning.

| 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. Cost estimates are expected to be accurate within a range of +50 to -30 percent. |
| ***State/Support Agency Acceptance*** considers whether the State agrees with the 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. |

The Preferred Alternative was selected over other alternatives because it is expected to achieve substantial and long-term risk reduction through off-site disposal, and is expected to allow the property to be used for the reasonably anticipated future land use, which is residential and commercial. The Preferred Alternative reduces the risk within a reasonable time frame, at comparable cost, and provides for long-term reliability of the remedy. Based on the information available at this time, EPA and the State of New Jersey believe the Preferred Alternative would be protective of human health and the environment, would comply with ARARs, would be cost-effective, and would utilize permanent solutions and alternative treatment technologies to the maximum extent practicable. Because it would treat a portion of source material constituting principal threats, the Preferred Alternative will meet the statutory preference for the selection of a remedy that involves treatment as a principal element. The selected alternative can change in response to public comment or new information.

**For further information on the CDE site, please contact:**

| Peter Mannino | Pat Seppi |
|---|---|
| Remedial Project Manager | Community Relations Coordinator |
| (212) 637-4395 | (212) 637-3679 |

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Ombudsman
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(732) 321-6621

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2890 Woodbridge Avenues, MS-211
Edison, New Jersey 08837

## COMMUNITY PARTICIPATION

EPA and NJDEP provide information regarding the cleanup of the CDE site to the public through public meetings, the Administrative Record file for the site, and announcements published in the Courier News newspaper. 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. The dates for the public comment period, the date, location and time of the public meeting, and the locations of the Administrative Record files, are provided on the front page of this Proposed Plan. EPA Region 2 has designated an Ombudsman as a point-of-contact for community concerns and questions about the federal Superfund program in New York, New Jersey, Puerto Rico and the U.S. Virgin Islands. To support this effort, the Agency has established a 24-hour, toll-free number that the public can call to request information, express their concerns or register complaints about Superfund.

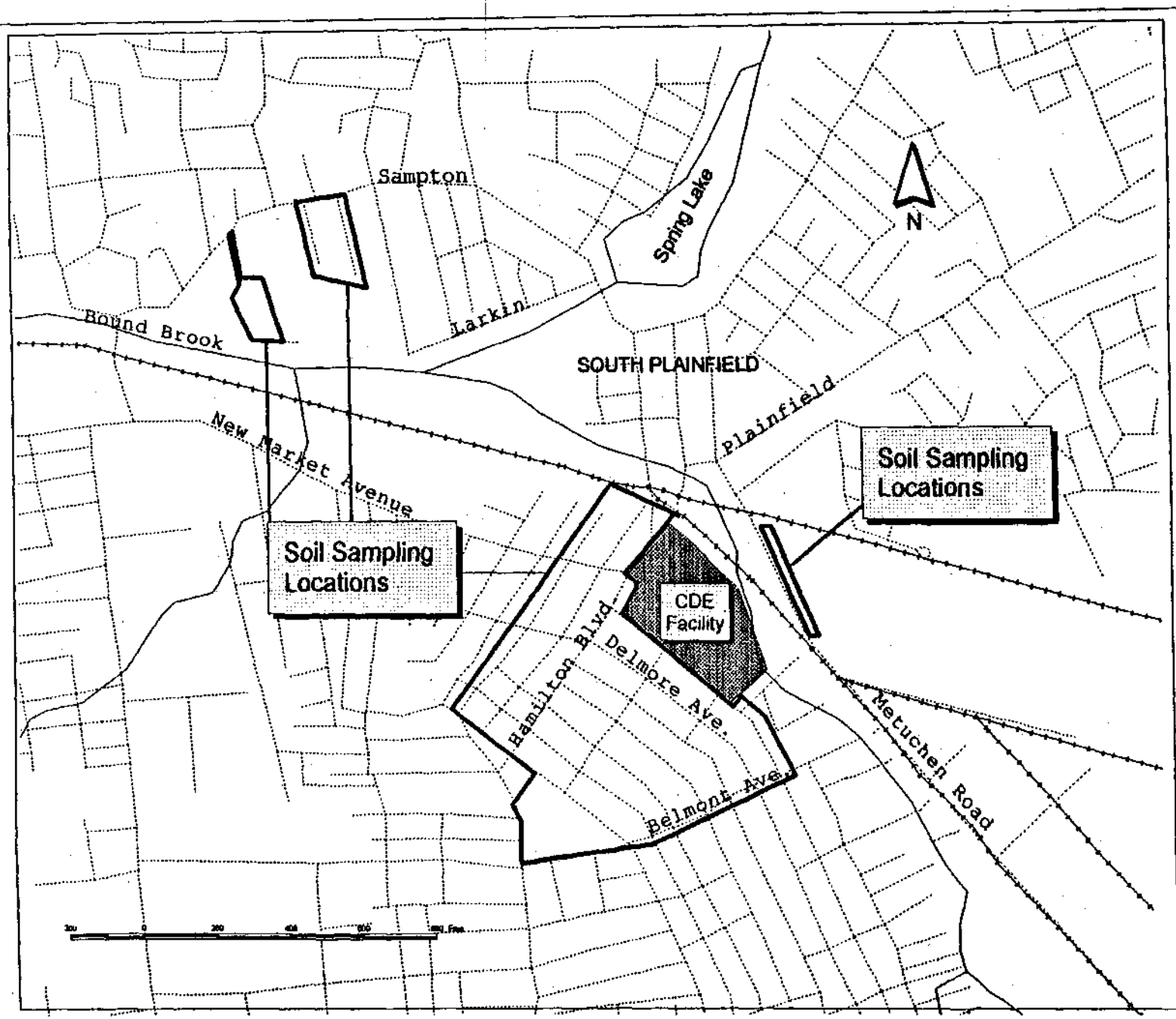


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Figure 1
Cornell-Dubilier Electronics Site
Residential, Commercial, and Municipal Sampling Locations

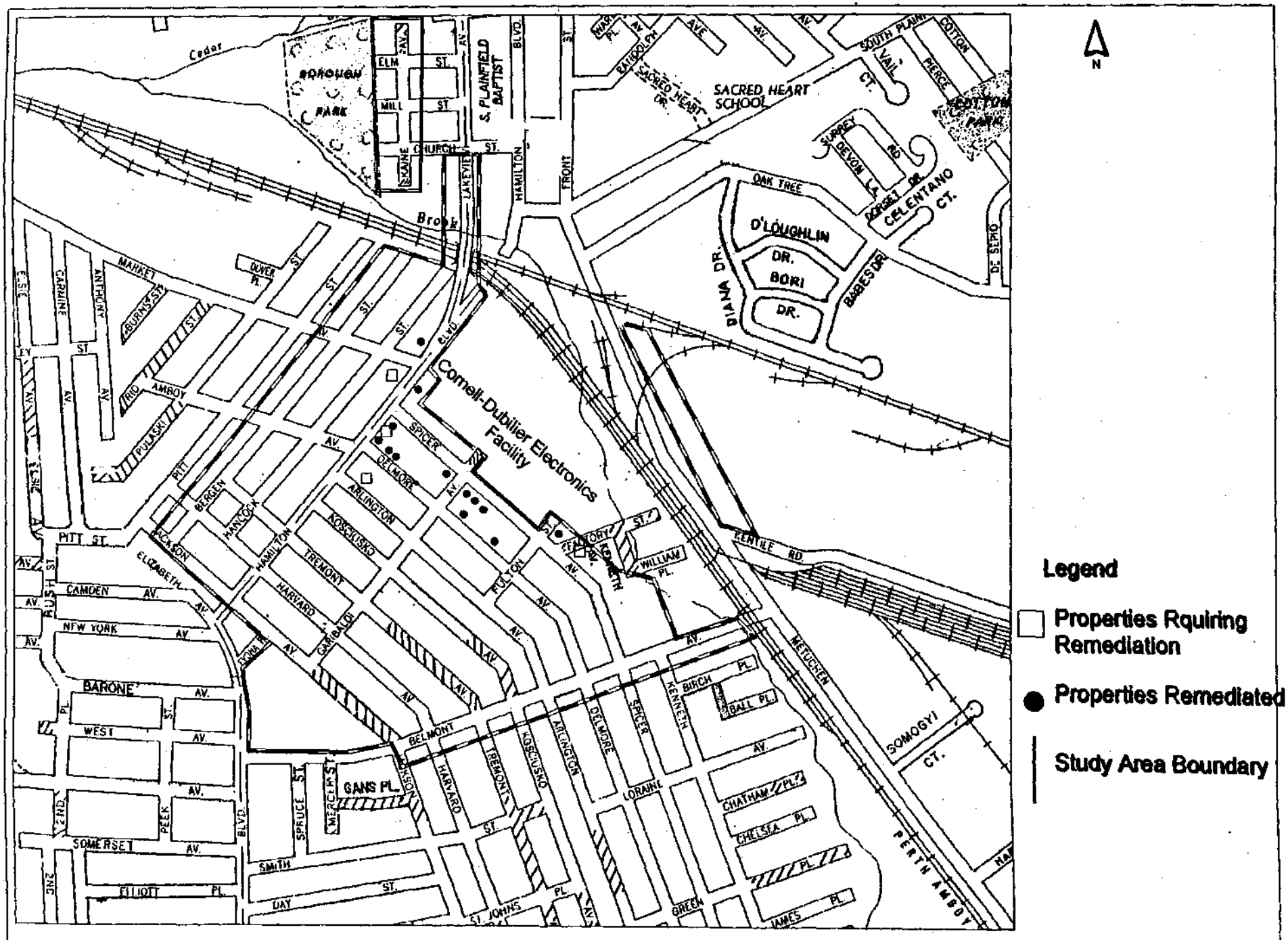
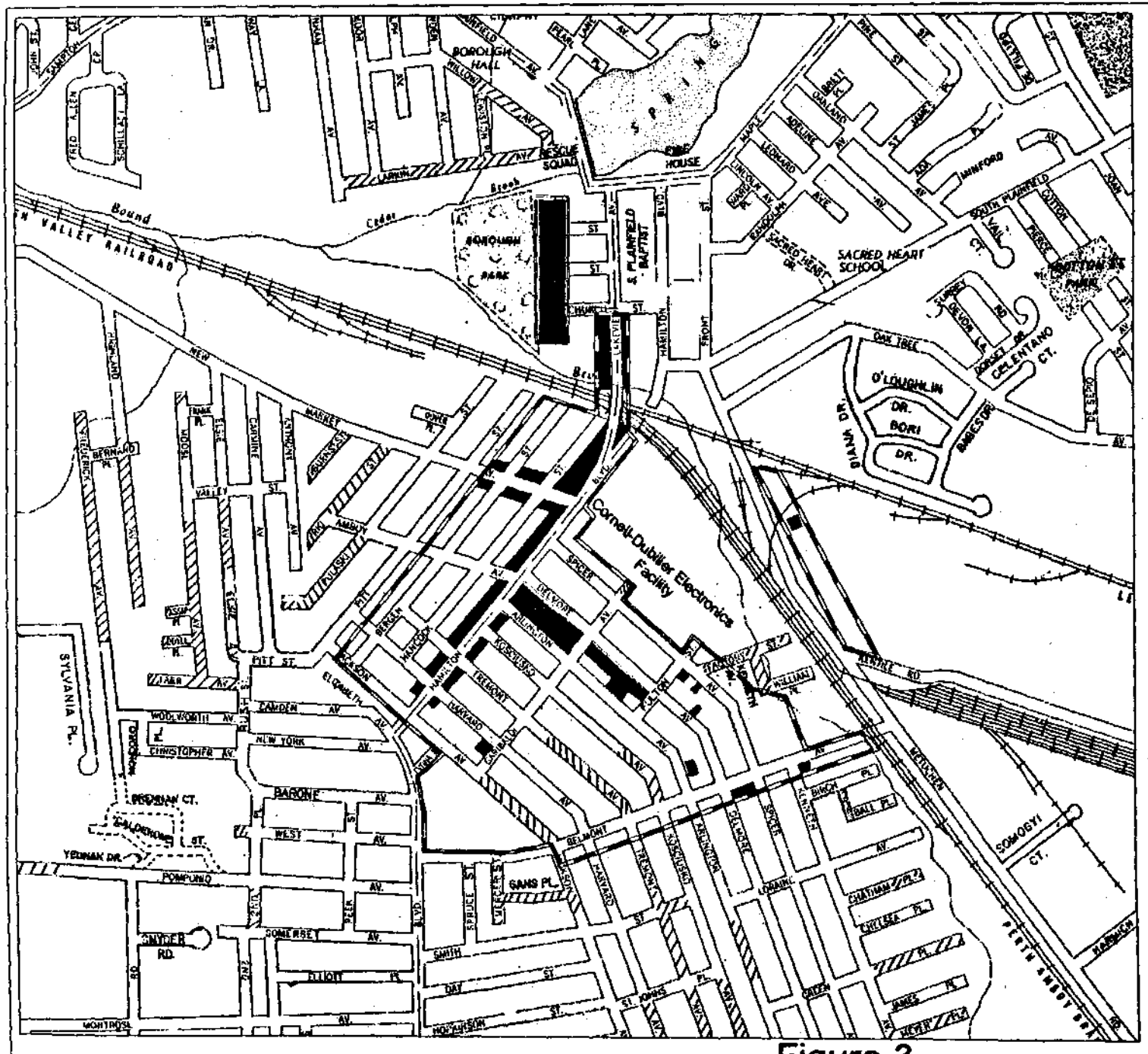



Figure 2
Cornell-Dubilier Electronics Site
Study Area




EPA

Figure 3
Cornell-Dubilier Electronics Site
Area Requiring Additional Sampling

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# ATTACHMENT B

# PUBLIC NOTICE

## U.S. ENVIRONMENTAL PROTECTION AGENCY REGION II
# INVITES PUBLIC COMMENT
## Proposed Cleanup for the
## Cornell-Dubilier Electronics Superfund Site
## South Plainfield, Middlesex County, New Jersey

The United States Environmental Protection Agency (EPA) announces the opening of a 30-day public comment period on the Proposed Plan and Remedial Investigation/Feasibility Study (RI/FS), which addresses the cleanup of contaminated soil at properties in the vicinity of the Cornell-Dubilier Electronics (CDE) facility in South Plainfield, Middlesex County, New Jersey. As part of the public comment period, EPA will hold a public meeting on **June 23, 2003, at 7:00 p.m., in the South Plainfield Borough Hall located at 2480 Plainfield Avenue, South Plainfield, New Jersey**. The meeting, which will address the proposed cleanup plan, will allow community members to comment on the proposed plan to EPA officials. A final copy of the RI/FS for residential, commercial, and municipal properties in the vicinity of the CDE facility and Proposed Plan may be reviewed at the South Plainfield Public Library, 2484 Plainfield Avenue, South Plainfield, New Jersey, and at the EPA Region II Records Center located at 290 Broadway, 18th Floor in New York City.

As the lead agency, EPA divided the site into three Operable Units (OUs). The first OU addresses residential, commercial, and municipal properties in the vicinity of the CDE facility. The second operable unit (OU2) will address the remediation of soils and buildings at the former CDE facility on Hamilton Boulevard. The third and final operable unit (OU3) will address the contaminated groundwater and contaminated sediments at the Bound Brook.

Based upon the results of the first Operable Unit RI/FS, EPA prepared a Proposed Plan that describes all the cleanup alternatives and provides EPA's rationale for recommending a single alternative. EPA evaluated the following three alternatives:

**Alternative 1: No Action**
**Alternative 2: Limited Action; Engineering and Institutional Controls**
**Alternative 3: Excavation; Off-Site Disposal with Treatment**

EPA recommends Alternative 3: **Excavation; Off-Site Disposal with Treatment** for the Preferred Alternative in the Proposed Plan.

Before selecting a final remedy, EPA and the New Jersey Department of Environmental Protection will consider all written and oral comments on this preferred remedy. All comments *must* be received on or before July 16, 2003. The final decision document, or Record of Decision, will include a summary of public comments and EPA's responses.

Comments will be accepted in person at the public meeting and/or in written form through July 16, 2003. Please address all written comments to:

**Peter Mannino**
**Remedial Project Manager**
**U.S. Environmental Protection Agency**
**290 Broadway, 19th Floor**
**New York, New York 10007-1866**

847590112

# ATTACHMENT C

# PUBLIC MEETING TRANSCRIPTS

ORIGINAL

PUBLIC MEETING

RE: SUPERFUND PROGRAM PROPOSED PLAN

CORNELL-DUBILIER ELECTRONICS SITE

BY: U.S. ENVIRONMENTAL PROTECTION AGENCY

June 23, 2003

PARTICIPANTS:

John Prince - NJ Remediation Section
Pete Mannino - Project Manager
Pat Seppi - Community Involvement
Marion Olson - Rick Assessor
Julie McPerson - Risk Assessor

TRANSCRIPT of the above named presentation taken by and before IRNA H. ROSENBERG, a Certified Shorthand Reporter and Notary Public of the State of New Jersey, License No. XI02220, at the South Plainfield Borough Hall, 2480 Plainfield Avenue, South Plainfield, New Jersey 07080, on Monday, June 23, 2003, commencing at 7:00 in the evening.

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MS. SEPPI: I'd like to thank you for coming out tonight for a public meeting. I was afraid we wouldn't have anybody turn out since this is the first nice day we've had in a long time, but again, thank you for coming out.

My name is Pat Seppi, and I'm the Community Involvement Coordinator for the Cornell-Dubilier Superfund Site. There are also other people from the EPA here tonight I'd like to introduce you to

John Prince, who is in the New Jersey Remediation Section; Pete Mannino is EPA's Project Manager; and Marion Olson and Julie McPherson are Risk Assessors with EPA.

I see quite a few familiar faces here tonight and I know the meetings in the past have been a little bit more informal, but tonight's public meeting will be run a little bit differently, and the reason we're here is to discuss EPA's proposed plan to excavate soil on three properties in the neighborhood of Cornell-Dubilier, and also to talk about some excavation of the soil for about another 50 properties.

Now, I hope a lot of you have received this Proposed Plan in the mail. If you were on our mailing list, you probably did. Some of you who already had copies might have had a chance to look at them, and if you haven't received them, there are some copies in the back that you're welcome to take. There's also a sign-in sheet in the back, and I've asked you to please sign that when you have a chance, just to make sure that you are on our mailing list and you'll be able to receive anything we send out in the future. Also, you'll notice we have a stenographer here this evening, and she'll be recording all the minutes of the meeting.

As you'll notice in the Proposed Plan, in the box it says "Public Comment Period." It started on June 16th and it's going to run until July 16th, and that gives you an opportunity to give us your input on our Proposed Plan. Anything tonight will be recorded, and if you think of something after the meeting or any of your friends and neighbors want to comment on it, you can certainly send any written comments to Pete up till the close of business on July

16th, and his address is in the Proposed Plan.

Now, after the presentation, and that's why this is a little bit more formal tonight, rather than just opening it up for questions and answers, we do have two short presentations, and then we will open the floor up for questions and answers.

What we'd like to do is ask you to please come up front and say your name so our stenographer will have a chance to get it for the record before you ask your question, and at the beginning of the question-and-answer period, we'd like to just answer questions about the Operable Unit 1 relating to the Proposed Plan that we have; and after all those questions and answers, then we'll be glad to go back and answer any questions you may have about the other aspects of the cleanup, so let me turn this over to John Prince, and he'll give you an overview of what we've done so far at Cornell, a lot of the work that has to be done, and where we expect to go in the future.

MR. PRINCE: Thank you, Pat. We were here two weeks ago and I see some familiar

faces from two weeks ago in an informational session, a more informal setting, and the purpose of that meeting was to actually discuss a different a part of the site, the facility itself, and there was an article in the newspaper over the weekend and that article also focused, primarily, on the Hamilton Industrial Park, and my role in my part of our presentation is to try and set the stage as to what that has to do with what we're talking about tonight and a little bit of what happened in the past, and it almost seems as if we're trying to be more confusing than we meant to be, so I hope to sort some of that out for you.

The people that Pat introduced are all part of the Environmental Protection Agency, so the Federal Government's Environmental Agency, and we have a sister agency, the New Jersey Department of Environmental Protection, and we've worked with them on sites like this, and by "sites like this," I mean sites that are placed on the national priorities list of Superfund sites, the major ones of highest concern around the nation for the EPA as far as

the Superfund Law which the EPA needed to set priorities. Couldn't work on everything, needed to work on those that were most in need of EPA's attention through this program, and if you were here two weeks ago, I'm going to repeat a little bit of what I said then.

The program runs in sort of two different stages. The emergency-response stage, or what we call the removal-action stage, comes first. It's when the site is first discovered. It's early on in the process, and removal-action involves sometimes actual cleanup, sometimes things like fencing, sometimes things like picking up steel drums, or emergencies that are related to a facility being discovered or drums being found or an operating facility suddenly becoming abandoned and company going out of business or something. like that where there is a sudden problem. And there were a number of what we call removal actions that took. place at the Cornell-Dubilier site and its surroundings in the late 1990s.

At the facility, we did a number of things including having the owner quit certain

operations that were going on at the facility, particularly a driving school that was operating in the rear of the facility on an unpaved, dusty and, it turns out, contaminated part of the site, and a lot of fencing of that facility and some regrading and some putting down of seeding so there's a grassy area in the worst part of that Hamilton Industrial Park in terms of contamination, which is the rear of the facility, and then paving of the parts that are being used.

There were also removal actions that took place in some of the neighboring streets. Pete Mannino will go into a little bit of the detail of some of the streets, but to put it simply, we collected some samples on some of the residences nearest the facility and found some levels of PCBs in soils outside of these properties, and then through one or another life practice like walking in and out of your door, some of the PCBs got into dust that was inside some of these properties and we ended up doing some cleanup work on a total of 13 lots.

And at that time, we collected samples, identified some properties, expanded

that investigation to another tier of blocks, collected more samples and didn't really find too much, and went another tier out, collected some more samples, didn't find too much, and at that time, it was felt that we had a pretty good handle that we had found most of the properties.

But it was not clear that we had found all of them, and that, really, is what brings us here today and brings us to the other side of what the Superfund's program does, which is what we call the remedial program, and that is, well, we solved the emergencies, put up some fences, prevented access to contaminated material, but what are we going to do for maybe some low levels, say, PCBs that still might be out there. We have to find out where they are. We need to find out whether they're a problem that really needs to be addressed, and then evaluate some permanent solutions for getting to the end of this.

This meeting tonight is one stage in that process for those residential properties and commercial properties that surround the Hamilton Industrial Park, and we

call that Operable Unit 1 or Phase 1, and our EPA's intent was to be coming to you with our proposed remedy for those properties a couple of months ago, and that would have prevented some of the confusion that maybe is. present now, and through circumstances beyond our control, we couldn't start this process until now and it so happens that we're also in the process of moving ahead on the next phase, which is the facility, the Hamilton Industrial Park.

So that's why we had a meeting two weeks ago, an informational session to get some feedback and to provide the community with information about that facility, and here we are two weeks later talking about, really, something different.

We're going to get some questions tonight, I would suspect, on both of those phases and, probably the third phase, which is the contamination that's in the Bound Brook, and there has been a fair amount of study by EPA of sediment contamination in the Bound Brook. There are some low levels of PCBs in there. At least some of it comes from the Cornell-Dubilier

site, and some of it clearly comes from other places, too, and EPA, because it's starting to become a very complex site, we've broken it into these phases or operable units. First is the residences, second is the facility and the third will then be the Bound Brook.

Now, let me talk a little bit about the process because unfortunately, this is relatively complex and unfortunately, this is just one stage in it.

The idea of the remedial program is you do a study, you evaluate the risks posed by the contamination you find, EPA does something called feasibility studies, EPA proposes a remedy, brings it to the community, that's where we're at right now, and then seeks public comment; and only after we receive that public comment and speak to our sister agency at the State of New Jersey, then we can finally pick that remedy that's the appropriate one for the site.

In this case, for these residences, as I think you'll see, it's pretty straightforward and if's pretty simple, but we

have to go through that process anyway, and at the end of the day, EPA will write something called a record of decision. It's a final document that says this is what will happen on these properties, and in essence, it becomes EPA's marching orders, this is what's going to happen, and Congress set up the Superfund program for us to go through that process so we can get public input, know that we've looked at a wide range of options, and then picked what is expected to be the best solution to this site.

This is somewhat a dry run for the next phase, which will be for Operable Unit 2, the Hamilton Industrial Park, which will be much more complex because of the number of options, the number of problems. The number of problems at that facility is much greater as well as the contamination is much greater, and the number of possible solutions are much broader and we will need to go through this process again.

So at this point, Pete is going to go into some details of what we found at the residential lots surrounding the facility, and then what our preferred remedy is.

MR. MANNING: Thank you, John. I'll try to be brief. My presentation has a couple of different parts to it. John covered the first part where he described the different operable units at the Cornell-Dubilier site. The next part of my presentation is, basically, going over and describing EPA's investigation of the residential and commercial properties that are in the vicinity on the former Cornell-Dubilier facility. After that, we'll start talking about the alternatives that EPA evaluated to address those properties. Then finally, as John said, we'll discuss EPA's preferred alternative on how to address those properties.

So if we can get started, actually, that first slide basically covers what John was talking about, how the site is being addressed in phases or operable units. The first one, Operable Unit 1, which is the purpose of tonight's meeting, deals with the residential and commercial properties that are in the vicinity of the former Cornell facility. Operable Unit 2, which is what we had a few information sessions on in the past several months, deals. with the

on-site soils in the buildings at Hamilton Industrial Park; and then Operable Unit 3 deals with the contaminated ground water at the site of the Bound Brook, but getting back to Operable Unit 1, let me give you a little history on the sampling and the approach that EPA began to address these properties.

In 1997, we began what we call the tier approach to do soil sampling and interior dust sampling in homes that were in the vicinity of the Industrial Park. The following figure shows how that tier approach was done.

The sampling began in mid 1997 on Metuchen Avenue, and then we started doing sampling on Spicer, Delmore and on Hamilton Boulevard, and also on Belmont. Basically, as John said, during that sampling, we found where there were some homes on Spicer and Delmore Avenue that had elevated levels of PCBs that required remediation. Soils had to be excavated and interior dust had levels of PCBs that were unacceptable, and as a result, we cleaned them up. Between 1998 and 2000, we cleaned 13 homes in that study area, and soil was removed,

properties were restored and the interiors were cleaned during that period of time.

At that point, we felt that there may be some additional areas that would require some additional sampling just to make sure we covered a large enough area to make sure we had a good handle on the scope of the project. So in 2000, we began another sampling event that covered approximately 13 right-of-ways, 19 homes that we targeted for extensive sampling, and we also did right-of-ways and sampling on homes that were in the flood plain of the Bound Brook, which are these two areas on the top left. Those streets are Fred Alien, Schillaci, Oakmoor and Lowden. I think I covered all the streets that we did in the sampling in the floodplain.

Then you can see near the Industrial Park, we sampled all the way up to the Roosevelt School and went out to Belmont and then Bergen Street on the northern end of the area. The purpose of doing this was to get a broad general area, making sure we captured the extent of the distribution of the PCBs, and what we found in that sampling was that although we had

addressed the 13 homes previously, there were three additional homes that we found where there were some elevated levels of PCBs that would require some cleanup.

What we also found was that there was additional homes where we did that curbside right-of-way sampling that there was some exceedances of EPA's cleanup goal of 1 ppm PCBs in the soils. As a result, we developed a pattern that supported whether it was windblown or vehicle-carried contamination from the facility, and what we found, also, was that the more frequent detections of PCBs in the soils were on the blocks closest to the Industrial Park and high-traffic areas like New Market Avenue and Hamilton Boulevard, which are the main thoroughfares out of the Industrial Park.

As I said, the sampling revealed three additional homes with PCBs in the soil that posed a potential health threat to the residents or the occupants. In addition, there was some other properties where more extensive sampling was called for, about 59 or 60 properties that we targeted where additional sampling needs to be

done.

The following slide shows the location of the curbside right-of-way sampling that exceeds EPA's cleanup goal of 1 ppm or State of New Jersey Department of Environmental Protection, our sister agency, has a cleanup criteria of 0.49 ppm, so the shaded area shows exceedances of our sampling of both EPA's and the State of New Jersey's cleanup criteria.

Based on our experience with the work that we did beginning in 1997 and the sampling in '98 through 2000, we estimated, conservatively, that there's about another 12 homes that when we do the additional sampling, some of these properties, will require additional cleanup, and there may be up to another seven properties that will require their interiors to be cleaned because of PCBs in the dust.

Based on this, we looked at three different alternatives on how to address these homes. The first one that we looked at is No Action. This alternative is required to be evaluated by law, and the regulations require that the No Action alternative is evaluated at

every site to establish a baseline for comparison.

The second alternative that we looked at is Limited Action. It's engineering and institutional controls. Basically, it consists of capping the areas where there's exceedances of PCBs in soils to minimize the exposure. Those areas to be capped would be those areas that exceed the 1 ppm of PCBs in soils concentration.

In addition, controls would have to be implemented such as deed restrictions to limit the future use of these properties. Under this alternative, we would also include interior dust remediation where additional sampling found PCB-contaminated dust in the home, so this alternative has a projected cost of approximately $770,000 to deal with the homes that we know require the cleanup, the approximately additional 12 homes that the additional sampling would reveal additional cleanup requirements, and would have a period of three to six months to implement.

The third alternative is the

Excavation and Off-Site Disposal alternative. Basically, under this alternative, PCB-contaminated soil at properties in excess of 1 part per million would be excavated and shipped off site for disposal in a regulated enclosure. Once excavation activities have been completed, the clean soil will be used as backfill and the properties will be restored. The sod that has been removed will be replaced. Fences and shrubs will a1so be replaced.

In the following figure, first of all, the dark dots are the homes that we've already done the cleanup on, the hollow square boxes are the homes that we've identified as already requiring a cleanup, and then the study area is bounded by the shaded broken lines where, basically, this is the study area where additional sampling could be done if a resident hasn't had sampling done on their property for one reason or another and is interested in having additional sampling performed.

Basically, under this alternative, there's an estimated 2,100 cubic yards of soil that would have to be excavated,

and the projected cost for this is approximately $760,000 and would take about a year to complete.

I just want you to keep in mind that this is not a year from today. It's a year from after the additional sampling is done and we've gone out and picked our decision like John discussed previously.

So basically, in order to compare the alternatives, although Alternative 2, which is the capping and the deed restrictions, would provide some protection to the properly owners and to the residents, the placement of a cover would leave the PCBs in the soil in place and would have to be managed for the lifetime of that property. The advantage of Alternative 3 is that it would remove all the contaminated soil above 1 part per million, and therefore, it would be protecting both human health and the environment that would come in contact with the PCB-contaminated soil.

The disadvantage to Alternative is that it's much more disruptive than Alternative 2. During the work, it will be disruptive to both the affected properties, the

estimated 3 plus 12, plus to the neighborhood, but to counterbalance that, it is a final remedy, that would address the PCBs, and those properties would never have to be managed over the long term.

There are proven procedures that we would implement during the implementation of this work and address those concerns, the engineering controls, the health and safety that would be used to address potential impacts to the residents or to the workers that are performing the work.

So those are the alternatives that we evaluated to address the properties that require a cleanup. It is EPA's preference to use Excavation and Off-Site Disposal, which is identified as Alternative 3, to address these properties.

The one thing that I think I overlooked in my description of Alternative 2 and 3 is that additional sampling can be done during this period for those residents who are interested for their indoor dust to determine whether or not there are levels of exceedances of

PCBs in the interior dust, and both Alternative 2 and 3 would require the remediation to cleanup that dust in the homes.

So that's, basically, my presentation, and at this time, we'd like to open it up to questions or comments that people have. I'd just like to remind people, as Pat and John said, we'd like to stay focused at this time on questions or comments on this Proposed Plan, Operable Unit 1. After we're done with that, we'll take a quick break, we'll regroup, and we'll answer any questions that you may have about other portions of the work that we're doing.

MS. SEPPI: Before we start, if you wouldn't mind stating your name, as I mentioned, so our stenographer will have it for the record along with your comment.

QUESTION BY MR. BOB SPIEGEL:

Q Bob Spiegel. I'm Executive Director of the Edison Wetlands Association. The cleanup standard that you're using is the goal of part per million. We recently contacted NJDEP,

and as you know, their criteria is 0.49 parts per million, so essentially, your goal is over twice what their goals are so you're going to be leaving contaminated property behind by using that goal. Is NJDEP then going to require that a deed restriction or deed notice be made on those properties that exceed the 0.49 parts per million?

ANSWER BY MR. MANNING:

A Good point, Bob. EPA set up a national policy of I part per million for PCBs. The State of New Jersey has cleanup criteria, as you mentioned, of 0.49 parts per million for soil. This plan identifies the cleanup goal of 1 part per million. What we've seen in a lot of work that we've done like this is in trying to clean up to the 1 part per million goal, we often achieve that State criteria of 0.49 parts per million; however, if we do not achieve that criteria, as the Proposed Plan states, the State of New Jersey can elect to take additional enforcement actions in order to achieve that cleanup criteria.

Q So they would come in after you

get done before you restore the property and do additional remedial work on residents' houses before you come back and backfill the area?

A The goal would be that it would be done at the same time.

MR. PRINCE: Let me comment on that. Pete used the words "enforcement action," and I want to make sure that it's put in context. We have had extensive discussions with DEP about the difference in our cleanup goals, and our experience, as Pete said, is that on lots that we're already working on, you tend to overexcavate to be conservative.

The result is, typically, that we would meet the State's cleanup goal, and the State's main concern was, are there properties that fit into this little window where they might not exceed one part per million, but they might only exceed the half a part per million, their number, and we don't think that that's likely but it could happen, and the solution that we have been discussing with them is that we would work on this additional window of investigation prior to – as Pete said, we have some additional

studies we want to do because we think there's a couple more out there we want to make sure we find, that we'll do it with DEP and they'll identify some properties that they think might fit into those windows that they want to investigate, too.

And the second thing that Pete mentioned was "enforcement action," and we have not explained, but maybe we should have, that there is an aspect of the Superfund program that involves seeking the involvement of the companies that were responsible for the contamination and, I where possible, getting those companies, if they 1 are viable, if they can do it to our satisfaction, having them do the work. And there are several companies, including the Cornell-Dubilier Company, that are still in business, they are well aware of all the work that we've done in investigating these lots and, in fact, the outdoor soil cleanups that were done on the residential properties in the late 1990s were performed under our direction but paid for by these companies, and our expectation is if this is the remedy that we choose, we would have

those companies also performing this work with our oversight and DEP would be at our side and they have a different criteria and if there is that small difference in the properties that falls into that window, the DEP would pursue them to have those —

Q Why don't you just have the 0.49 as the criteria for the site and not have that difference between one agency doing it or another agency doing it and it would probably go quicker. If there's only a little bit of extra soil, like you're saying, why not just use the 0.49 as the criteria so people aren't left, potentially, with contamination on their property where they have a problem down the road when they'd be selling it.

And then just two quick follow-ups and then I'll let somebody else go. You were just recently quoted as saying, "This is a unique site" in the paper, and would it. be fair to characterize this as this is probably one of the most contaminated sites that we have out there due to the number of contaminants, the volume and how far it spread; and then the second thing would be the monitoring that we had

requested at the last meeting, you were going to go back and resample the homes that you previously cleaned as part of this, correct?

A Yes.

Q So if you find levels of PCBs in these people's homes that were previously cleaned, wouldn't that indicate to you that there is a potential ongoing pathway to the site into the residential homes that would require monitoring at the fence line, because I went to the site the other day and that site is not completely vegetated. It has a lot of open areas that there's open soils on the property where you could obviously see that there's potential for dust to continue to migrate, so if you do find exceedances in the houses that were cleaned, might that indicate that you may need to see some monitoring to see what's on the site?

MR. PRINCE: That's a couple of questions.

Q The first one should begin at the 0.49.

MR. PRINCE: It's now within the EPA's decision-making to go beyond the 1 part per

million. It's a nationwide policy. That's the approach that we have taken as an agency, and we could go into — although I would choose not to at this meeting, we could go into differences in how you get a number like 0.49. Well, it's a risk calculation. What goes into that risk calculation? Well, there's all sorts of assumptions that you need to make, and one of the reasons why we don't necessarily accept DEP's number is there are different assumptions that might have gone into their picking that number that we don't agree with. So the result is that as an agency, we have that standard that we use across the country. That's Part 1.

Part 2 was monitoring?

MR. SPIEGEL: Monitoring and the sampling inside the residences.

MR. PRINCE: We performed work on these properties in the late 1990s, including indoor cleanup work and outdoor soil work, and did follow-up sampling after we were done to make sure we were done. We are now picking a remedy that, in essence, is very similar to what was done on those properties, but just as a

precaution, we're going to revisit those lots again and make sure that the cleanup that we've done there is consistent with what we would like to choose now. You proposed a hypothetical, which was if we then go back to those lots sometime in the future and we find contamination, would that suggest something, and I suppose that it might.

You tied that to a second question, which was, well, there's a facility there and there's very high levels of PCBs in the soils on that facility, and isn't there a concern that there's dust generated and that dust might be leaving the site. I think that's, in essence, what you said, Bob.

MR. SPIEGEL: An ongoing problem.

MR. PRINCE: An ongoing problem, and EPA is pretty clear in the studies that were done that the cause of the stuff that's gone off the site is either truck traffic leaving the facility during the 30-odd years of operation and then the years beyond while it wasn't completely paved and while there wasn't vegetation over that

back lot.

And the other possibility is windblown contamination. We think that's probably why there is this relatively low level on residences nearby the facility. We've taken a bunch of actions at that facility. We think that including, probably most importantly, fencing off and vegetating the rear of the facility and stopping the truck-driving training school in the back of the lot unpaved and it was very dusty, and we feel that that on-site problem is addressed at this point. It doesn't mean that it's the solution by any means for the on-site problems. We don't feel there is a migration potential anymore.

MR. SPIEGEL: Do you have any monitoring at the fence line to prove that your theory is correct, that there is no contamination and/or vapors from that site leaving the property?

MR. PRINCE: We haven't done any sampling in the last three years for that.

MR. SPIEGEL: So you're making an assumption but have no data to back it up.

MR. PRINCE: That's right, but I'm making a — EPA has made an assumption based on experience at this and other sites, yes.

MR. SPIEGEL: Thank you.

QUESTION BY MS. ALLISON SPEISER:

Q I'm with Edison Wetlands Association. You've been talking both about the contamination on residential property and commercial. For clarification purposes, could you go over the criteria you're using for the soils on residential properties, interior dust in residential properties, as compared to those criteria that you're using for the actual property of the soil and dust?

ANSWER BY MR. MANNING:

A We're talking about sites on the residential and commercial property that surround the vicinity of the Industrial Park.

Q I understand that, but just, for comparison purposes so we can get an idea of the differences, could you go over the difference?

MR. MANNING: Typically, EPA has a cleanup criteria for commercial properties. We

haven't selected a cleanup criteria for the Industrial Park at this time; that is, the property we talked about- earlier. If you'd like, we could discuss it further later tonight.

QUESTION BY MS. GALE FINN:

Q Who decided or what decided the boundary?

ANSWER BY MR. MANNING:

A Basically, we"looked at the data" that was collected up to 1998, and we expanded upon that, and we looked at what would be a worse-case scenario for a dust-blown or traffic-blown situation. So for example, in the western portion, we were looking at areas along Cgsciusko and Harvard, along those streets, and then with the Roosevelt School being nearby, we decided that it would be safer if we went up to Roosevelt School and sampled Roosevelt School to make sure that, there was no impact to the children at that school.

We took a similar approach in looking in the other directions on New Market Avenue and on Belmont, and what you typically see

in the result is that we defined those boundaries pretty well based on the last sampling that we did in 2000. Is it an absolute? Those lines are not complete boundaries. If there's someone nearby those boundaries that would like to have their properties sampled, give me a call and we could look at that.

Q My actual question is that the Bound Brook runs through past the property into what is a landfill down by the football field which was built on — I won't call it a dump, but landfill, and recently, I'm not sure you're aware that we had some bubbling crud coming up in the football field which the Bound Brook goes through and where it is now the landfill and, of course, it had a beautiful swamp right behind it by the wetlands, so as you're saying, as a home owner or resident, we can ask for that to be tested, but could we ask for that to be tested down around that entire area where the Bound Brook runs where our children are?

And one other point, exactly across the street from your corner at Pitt and Bergen, maybe 50 yards away from there is the

girl's softball field, and I didn't know if that is that under testing.

ANSWER BY MR. MANNING:

A Let's talk about the Bound Brook first. EPA has done extensive sampling along the Bound Brook corridor. That's part of Operable Unit 3, which we discussed earlier. We collected well over a thousand samples over a 2 ½-mile stretch of the Bound Brook corridor.

What we found was that there were low levels of PCBs in the sediments and along the banks of the Bound Brook. Because of that, we targeted four different areas for sampling at higher elevations near the Bound Brook corridor where we felt that there was a potential for flooding to impact on the surrounding community. One was Veterans Memorial Park where we did sampling. The other one was in the areas near Fred Alien and Schillaci, and we also looked at the area near Highland and New Market Avenue.

We then took the two worst areas out of that sampling event, and that was Lowden and Oakmoor and then Fred Alien and Schillaci.

What we found on those sampling events was that although there was some sporadic hits of PCBs in the soils, with the exception, I believe, of one sample out of some odd — I want to say about 74 samples, none of them exceeded either the State's cleanup criteria of 0.49 parts per million or EPA's criteria of 1 part per million.

When you look at near Pitt Street, on Bergen and on Hancock, in that general direction, there were no exceedances of either the State's cleanup criteria or EPA's cleanup criteria, so for us to go further away —

Q But it seems to me if the Brook's going by the landfill and the landfill is over the baseball field, which does sink 3 or 4 inches a year, and the Dismal Swamp going out behind it, wouldn't that be a place where the EPA should just target when you have 500 kids a year playing on it?

A We're going to be doing additional investigation as part of Operable Unit 3 that is going to be beginning shortly. If you'd like, we can talk about that after this meeting, but based on the sampling we did in the

floodplains and on the residential properties, we didn't see the Industrial Park impacting the areas that you're describing.

Are there other potential sources that are impacting those? That's something that we would have to look at but we couldn't address under this plan at this time.

Q So should my kids play there next year or not? I think we should close down the facility.

A We have no data to indicate that any of those parks should be closed.

Q But you haven't collected data.

A Not related to this site. That's correct.

Q So you have no data, and to get that data collected, we have to do what?

A The next sampling event is probably going to start sometime this summer or early fall, but you have to keep in mind, doing a tiered approach here, we can't go out and sample every location in South Plainfield and —

Q I understand that, but we're talking about children playing on baseball fields

and water and somewhere, the priority has to be above what happens with the dust and — as I said, I've been sitting there for 20 years. Am I going to glow in a year and a half?

A It's a valid argument, okay? However, for example, we looked at Veterans Memorial Park. We had done additional sampling on Veterans Memorial Park, and there were low levels of PCBs in Veterans Memorial Park.

Q Did you miss something there?

A The park was closed; however, there are other issues in Veterans Memorial Park other than the PCBs. There's asbestos and some other issues that are unrelated to the work that's being done at the Industrial Park and contaminants that are coming from the Industrial Park, so are there other issues in South Plainfield that are unrelated to the investigation we're doing at the Industrial Park? Potentially. I can't, unfortunately, go out and sample every location in South Plainfield and Piscataway —

Q Could you give us a little kit and we'll do it for you?

A If you'd like, as I said, after this meeting, we could talk a little bit more about the Bound Brook investigation and other sampling we're going to be doing as part of those investigations.

QUESTION BY MR. JOE ANIENUS:

Q You touched on deed restrictions with respect to residential sites. Would you just expand on that or define that, please?

ANSWER BY MR. MANNING:

A If we don't clean up to EPA's criteria of 1 part per million, there would have to be some kind of notice on a deed or a title that would indicate that this property is contaminated and that future purchasers have to be aware that they are buying a property that has these exceedances of PCBs. As Mr. Spiegel mentioned earlier, the State has the cleanup criteria of 0.49 that if that's not met, the State could look at, potentially, deed restrictions for those properties, also.

Q Do you see that as a problem?

A That's not the alternative that

I'm saying we should be doing. I'm saying we should excavate and clean up to the appropriate criteria so that deed restrictions are not necessary.

MR. PRINCE: The purpose of the deed restriction is to assure that the remedy that we leave in place, you want to make sure it stays in place, and one way to do that is to insure that the next owner knows that there's some issue there, and so it's done all the time on many properties and we certainly should consider it here and it's part of our feasible alternatives as a possible remedy. It's an ecological management, EPA would be involved in that, and for this relatively small level of contamination, relatively low levels on not many properties, it seems to me that EPA's position is it would make far more sense to solve the problem.

QUESTION BY MR. ANTHONY RISOLI:

Q I have a question. You already moved contaminated products from the township from the residential areas that you already

cleaned up?

ANSWER BY MR. MANNING:

A Yes.

Q So you already removed some contaminated products.

A There was soil and dust at 13 properties that has been already removed.

town?

Q That has been removed from the

A Yes.

Q The routes that the trucks took to remove the product to the final location, where did the product go?

A The soils went to, I believe, a facility in Pennsylvania.

Q And it went from the sites to what route?

A I'm sorry. I don't have the exact route on me and that was years ago. It had to go on Hamilton Boulevard at one point, and where it went there to get to 287 —

Q That was my concern because you show on your figures that here's a higher degree of contamination along Hamilton Boulevard, and to

reach 287, the truck route that you're going to pick, the dust contamination from the route that you're picking, what position is EPA taking to minimize the dust contamination along the route before you get to a major intersection or major interstate, and if you're going to take Hamilton Boulevard, I could understand. Hamilton Boulevard's going to go through a major reconstruction where the surface coverage may not be optimum at the time of removal of the contaminated soil, making your route highly susceptible to more contamination because of the routes that you're picking.

What is the EPA going to do and what provisions have been made in the further removal of contaminated soil from the township to protect the residents as the contaminated soil is removed from dust contamination in a very high-traffic area as Hamilton Boulevard as it goes to 287, or have you made other provisions to remove the product via rail?

A Before we begin any work, we go through a process of developing the next set of plans, and part of it discusses what is the route

that it will be taking and what provisions are going to be in place to insure that there is no additional dust generated or any spills from those vehicles, so those provisions will be put in place as those plans are developed.

MR. PRINCE: As a standard practice, we decontaminate any trucks that have a potential to come into contact with contaminated soil before they left that site.

Q Are they enclosed?

MR. PRINCE: Yes, they're sealed. You have a very good sort of set of questions of how this is implemented, and we have really talked about that and we can go into it in more detail, but the simplest way that I might explain it is if we can't do the cleanup safely and prevent contamination from being spread around, we can't do the cleanup, and there are some sites, some places, where it doesn't make sense for various reasons to actually take an action because it's more destructive than it would be to leave the material there; and for these residences, it's far better and very manageable, something we do all the time, to do

the cleanup, get the stuff into appropriate vehicles, get them off there, get them to the disposal facility and then do the restoration.

Q I have a question and I don't know if this is the appropriate time, but you did sampling on the interiors of the homes and you did sampling along the Bound Brook. Have you considered doing any sampling, again, with truck routes, in reference to the integrity of wells along those truck routes or anybody who has wells in that area and are using those wells as part of their drinking water?

In other words, there is some city water along those routes and in that area, but there are still homes that have working wells in that area. Has there been water samples taken, or is there a plan to have water samples taken? After you disturb the ground, you may have a different water flow into wells that are still operating in that general vicinity. Is there anything being done in that manner?

ANSWER BY MR. MANNING:

A Going back to 1998, the State of New Jersey DEP conducted extensive sampling of

residential wells in the area of the Industrial Park, and they found elevated levels of trichlorethylene in those wells, not PCBs. As a result, those wells were shut down by the State of New Jersey. As part our third operable unit, we're going to be doing a larger groundwater investigation, but as a final point on your question, any residents who call me having concerns because they live in the area and they still have a private well, we take the measures that are necessary to do the sampling on those wells.

QUESTION BY MR. WILLIAM HOGAN:

Q Concrete samples were taken in Columbia Products which is now occupied by Jimmy's Truck, and the PCBs levels there were 21,200 parts per million. Now, when and if your people are going to go ahead and demolish those buildings, there's going to be an awful lot of dust. Now, you've been saying you're going to wash it down with water, but however, there's going to be some contamination again on the houses on Spicer Avenue because of this action,

and what precautions are you going to take? The fellow over there, he said he wants monitors on the fence line, which I think should be done. That has to be done.

ANSWER BY MR. MANNING:

A I don't mean to not answer your question completely, but I really want to focus in on the work we plan on doing at the Industrial Park and we'll talk a little more about that later, but what I will say now is any work that's done, measures will be in place, including air monitoring, just to insure that those properties near the Industrial Park are not recontaminated, so we do extensive air monitoring at any time we do work.

For example, even when we're talking about the work that we plan to do on residential properties, the excavation of a couple of hundred yards of soil, there is a system or network of air monitoring system put in place to insure that excess dust is not being generated and there are no exceedances.

Q And that doesn't stop?

A We stop work if there's an

exceedance of any of the air-monitoring stations

Q They have someone there?

A At all times the work is being done, those air-monitoring stations are operating. There are people that collect data continuously.

Q Is there a chart there?

A There's two parts of it. There's an hourly read-out, and then there's a printout of the data for the whole day, so someone's continuously monitoring it and at any time if we have exceedances, we have to stop work. We have to really determine what went wrong, why we had those exceedances and what additional measures we have to put in place to make sure it doesn't happen again.

Q One other thing. I've got another question here. The gentleman to your right said that there might be other PCBs entering the Bound Brook stream. Could you elaborate? Who's dumping PCBs on that site?

ANSWER BY MR. PRINCE:

A There's another Superfund site, in Dismal Swamp called Woodbrook Road.

Q Also, every PCB in South Plainfield has been created and — but I grew up in this town so I know. I seen it. That water from the Bound Brook stream used to be running yellow in there. Now, for that contamination to go down that far, the gentleman over there said something about the wells, which was one of my questions. That well there contaminated — I mean that dump site contaminated everything else, which leads up to remedy, and you said "remedy, " which means you people are going to go back and decide how you're going to clean up this mess. Am I right on that? Are you going to clean it up?

ANSWER BY MR. MANNING:

A We're talking about the Industrial Park. By the end of the summer, the plan is to have another meeting like this where we identify EPA's preferred alternative on how to address the Industrial Park. I don't mean to cut you off, Mr. Hogan, but if we could talk about the Industrial Park —

Q That's what we're talking about.

A That's a good question, but we

can talk about that at the end of this meeting. First, let's address everyone's questions regarding the residential and commercial properties under this plan, and then after that meeting, we'll take a quick break and then we'll answer any questions that you have on the Industrial Park and other sites in the area.

Q How many more homes are there, maybe like 17 more?

A We found three homes as of our last sampling investigation that will require soil cleanup, and there's one additional home that was sampled prior to our last sampling event that requires a cleanup, so there's four properties that we know.

Q What streets are they on?

A One on Spicer, one on Hamilton, one on Arlington and then which one have I left out? Two on Hamilton, excuse me.

QUESTION BY MR. PAUL GARFIELD:

Q I have a question about the cleaning you're going to do on the residential properties. As I understand it, you're, going to

clean some additional off-site properties. When I say "off-site," I'm talking about off the Cornell-Dubilier site, right?

A There are four that we know of, and based on the additional sampling that we're going to do in the chart I showed before where we had some exceedances still, we estimate there may be another 12 that will require this cleanup, and then the other number put out there is based on people who call up and say, "I would like to have the interior of my home sampled." We're estimating there may be another seven homes that will require cleanup.

Q Now, as I understand it you have no data along this fence line and you haven't resampled the properties that were already clean, so my question is without cleaning up the site, the source, what harm would there be and how much greater expense would there be to EPA to just retest the areas that were clean, however many years that you've done that, three, five, I don't know, and test them because what if you're wrong? What if without, any data along the fence line, without any retesting out of these properties you

did, that you discover down the road that's recontaminated? Now, you go and clean new properties, you have that same problem again. I've seen it happen and I've been involved in situations where that has happened, and I'm wondering then what have you really accomplished and without that data, how can you implement this plan without spending a little money to just back yourselves up to make sure you're right, because if you're wrong, you may clean up something that's going to just get dirty again and keep going down the road and happen again.

A Couple of good points you made, the first regarding we have no data on this fence line. We have a ton of soil data, but what we haven't been collecting over this period of time is the air-monitoring data. I'm not sure how familiar you are with the Industrial Park. I'm going back four or five years, going back to probably 1997, but for those people who are familiar with the area and know about the activities at the Industrial Park, any time you went near that park, there was a cloud of dust coming off that Industrial Park. No matter what

time of day it was, there was heavy traffic going in and out. You actually saw dust coming from the Industrial Park. None of the areas were paved, none of the areas were vegetated. You go by there now, all active areas are paved with asphalt. The unpaved areas are fenced and are well vegetated.

Now, Mr. Spiegel may disagree with me on what "well vegetated" is and that's his prerogative; however, there's clearly a difference in the conditions from 1997 to today. Does that mean that there is no off-site migration of contaminants? I can't say that with 100 percent assurance.

Q If you don't know, how much would it cost and what would it hurt to test that now before you do this other cleanup to make sure you're not — I'm sure you're all working very hard on it, but wouldn't you want to know that before you did it, and I have a whole host of other questions, but that's for some other part, but wouldn't you want to know that before you go and clean this other area, that you were right, because if you make a mistake, you just spent a

lot of money for nothing, so why not invest a little now?

A That's a valid point, and before we actually perform the cleanup on these properties, additional sampling needs to be performed on the properties to determine how much volume of soil is going to be removed. During that period, which we call our design phase, we can collect additional data that you're talking about and do the air monitoring before we actually begin any kind of cleanup. We don't have any intentions of cleaning up these three or four properties and then determining that the others were recontaminated previously. Additional sampling has to be collected before we perform any of this additional work, and there's no reason why that additional data couldn't be collected.

Q But will it be collected? I understand that you can't commit today, but is it your intention in the phase of this program to do that?

A Yes.

MR. PRINCE: We have thought

along the same lines in a couple of ways and in that way, we have already done some cleanup and it makes sense for us to revisit those homes and make sure that they're consistent with what we plan on doing and to assure that there is not some sort of a recontamination effect going on, and along those lines, it probably makes sense — I know it's hard for you all to make sense of this because many of you are hearing about it for the first time, but I want you to try to put this a little bit into perspective in this way, and that is that that facility operated from the 30s to the 60s and that it was unpaved until the 90s, so that's about 60 years of opportunity for dust to be spread around, and there are thousands and thousands of parts per million and high levels of PCBs in the soils on that facility.

I don't want to mislead you. There are very high levels there, and we found relatively low levels, unacceptable levels, but relatively low levels of PCBs in surface soils on a few lots relatively close to the facility. We expanded the investigation, found a trend that suggested that it was even less as you move

further away, and the likelihood that in the few years since the paving took place, that this process has sort of restarted itself, it's possible but it's unlikely, and we can do that sort of testing as well.

QUESTION BY MS. SANDY SUVERINI:

Q I have one comment and one question. The comment is, the idea of monitoring of the fence, it would make me feel much safer, and my question to you is, the sampling that you did in the Bound Brook, when was that done?

ANSWER BY MR. MANNING:

A The sampling was done before Hurricane Floyd, about 1998, '99.

Q The Bound Brook fluctuates with the weather, so couldn't the weather we've had this past year have affected it because it sort of seems to me that you sort of dead-ended your sampling on Belmont Avenue which makes me concerned because I actually spend more time at the baseball and football fields than I do in my own backyard on Spicer, so I'm just very concerned about that area and that being so long

ago and with the fluctuations of all the rain and everything, could that not, in your experience, change things?

A Sure, flooding over time could move some of the contaminants. That's why as part of our investigation for Operable Unit 3, we need to do additional sampling.

Q And that would be before the end of this summer, you said?

A Yes.

MR. PRINCE: Why don't you put up the figure again that shows the floodplain area sampling that we did, because that was part of our sampling approach which was — there was a possibility when we were starting the study that there is flooding that's spreading the PCBs contamination. We know it's relatively low levels, but it's unacceptable levels. There's a possibility that it's getting spread to other land, and.. we specifically targeted some areas, residential areas, that we felt were most likely to have been inundated sometime, and therefore, it would be a possibility that there would be residues not from one source, not from any single

event, but again, over 60 years.

MR. MANNING: So the top left area, we have two areas that we sampled, Fred Allen and Schillaci and then Lowden and Oakmoor. What's not on here is the sampling that we had done from, basically, at the Cornell facility all the way down the Bound Brook corridor and other floodplain areas along there.

Q What I'm seeing is that you didn't go beyond the Belmont border.

A Right.

Q Show us where the baseball fields are.

A The baseball fields are right about here, right?

Q Right, and the football fields are behind that.

A Right.

Q And where the Dismal Swamp is where the people have been evicted as of July 1st, I believe, the Dismal Swamp is right behind there where they've been evacuated runs through the baseball field and then landfill and then to Bound Brook, so I don't see anywhere on there

where you checked that.

A The Bound Brook flows from this direction down this way. That's the flow of the Bound Brook. When looking at flooding, based on the data that we have seen downgrading of the Industrial Park, flooding has not impacted the residential properties that are adjacent to the floodplain.

Now, do we need to do additional work upgrading the site? Yes, and we're going to be doing that because there's also another Superfund site which we talked about, the Woodbrook Dump site that's upgrading the Dismal Swamp site, so as far as additional investigations, we are going to be looking at that section of the Bound Brook corridor.

Now, have we looked at properties in this area here to determine whether or not, since they are in the back of the Industrial Park, whether or not the Industrial Park has impacted them? Yes, we did sampling all along these areas, and what we found was there were a few exceedances, and when we did the extensive sampling, there was no impact to those

residents from the Industrial Park, so when looking at the windblown and from flooding, we didn't find any problems with any of those homes; however, do we need to do additional work because of other sites that we're finding in the area?

Yes, but that's going to happen shortly over time.

MEMBER OF THE PUBLIC:

Q "Shortly and over time," doesn't seem to make sense.

A Sorry. I understand your concern, but based on all the data that we collected, and I know we don't have any data from that football field and I can't go out there tomorrow and collect the data, what we found in the area right around the Industrial Park is that those properties in the area that you're talking about haven't been impacted. Are we going to do additional work? Yes, we are going to do additional work as a result of the other site that was identified.

QUESTION BY MR. ERIC HOLDERMAN:

Q Could you go to the preceding

slide that you had before?

A Sure.

Q I live on Schillaci Lane. You've been sampling all the way up to Sampton Avenue and we've never had flooding on Sampton Avenue. If we did, we'd be in bad shape. We'd be under water. Why would you do sampling all the way up to Sampton Avenue?

A When I was looking at the extensive sampling we were going to do, in my mind, it didn't make sense to take an arbitrary line and say, "I'm going to stop sampling here because because your property may have been sampled and your neighbor wouldn't have been sampled," and then potentially, your neighbor would say, "Why didn't you sample my property?" so there were a few extra samples that we had left and we wanted to cover the whole entire area to see, also, if there was a pattern, at what elevation has flooding impacted these properties, here is clearly a line where, potentially, the problem begins and ends and this is an area where there's no longer a problem.

What we found was that there is

no line on Fred Alien and on Schillaci. Basically, the problem is isolated to the banks within the floodplain of the Bound Brook and hasn't impacted any of those properties on Fred Allen or Schillaci.

Q The other question I have is, next-door neighbor bought his kid, just recently, an all-terrain vehicle, a TCD, and the kid takes it into the area along the banks of the Bound Brook corridor. Now, that hasn't been sampled. He comes back and he washes off the residue underneath the vehicle and everything washes down, the water flows down the street and I'm getting little sandbars in the gutter where my house is. Now, how hazardous is that if it hasn't been tested in the corridor, the Bound Brook corridor?

A Most of the Bound Brook corridor has been sampled. A 2 ½-mile stretch has been sampled, and that sampling was done back in the '97, '98 time frame. We looked at that data and we said there are recreational users in the Bound Brook corridor. For example, there's fishing and people who go hiking and use the trails. We had

our risk assessors look at the data, and what they said was that for the recreational user, the levels that we're finding don't pose a threat to those users.

Q What about people who are fishing in New Market Pond?

A What we did in New Market Pond is back in 1997, we posted with the New Jersey Department of Environmental Protection a fishing and hunting advisory that basically said it's safe for you to catch, but you must release all fish from the whole Bound Brook corridor all the way down to the Raritan River that the State of New Jersey imposed, and they imposed that fishing and hunting advisory throughout the state in different areas of the state, not only in this area.

Q You don't see any signs. There are no signs there.

A We posted signs at times because various people take those signs down. We tried to work in the past with the Borough of South Plainfield on posting additional signs, and if the Borough feels that additional signs should be

posted, we would work with the Borough on doing that.

Q People fish by the Clinton Avenue Bridge, and there's no signs there.

A If you want to talk a little more about fish, we can take that a little further later on.

QUESTION BY MARIA SHAY:

Q I have a question regarding the same area, the Fred Alien area. You said you tested that like in 1997.

ANSWER BY MR. MANNING:

A No, that was in 2000. That was the most recent sampling that we did, in 2000.

Q So it was after the Hurricane Floyd?

A Yes.

Q I know that whole area was all flooded at the time. Okay.

QUESTION BY ANDREW TIGNARO:

Q What were the levels around the Roosevelt School area?

ANSWER BY MR. MANNING:

A There were some concentrations of PCBs detected; however, I don't know off the top of my head, but the lowest concentrations were well below — it was 0.0 something, if I'm not mistaken, and we'll look that up.

MR. PRINCE: In the world we live in, we can go just about anywhere, with the type of implementation that we have today, and we can find some level of PCBs and they're pretty ubiquitous, and that's why there are these standards and the levels were below that, even the DEP's more restrictive numbers.

MR. MANNING: The average is not in the document I have here. I you'd like, you can give me a call tomorrow in the office. My number is all over these documents that we have here, and I'll put out the exact number for you, but as we said, it's well below even the most strict numbers.

QUESTION BY JANET LAPSLEY:

Q On your Figure 3, my question is, I understand you're doing additional

sampling and I understand Hamilton Boulevard and Spicer and Delmore, but when you get down between Fulton and Delmore, you have a sampling area on one side of Delmore, and then you skip over to Arlington and then you skip over to Belmont. Can you tell me how you define or how you figured out which areas you were going to resample?

ANSWER BY MR. MANNING:

A First of all, in Figure 3, where you see the dotted line at the boundary, we sampled almost every property. We sampled all curbside right-of-ways within those boundaries.

Q Okay.

A Now, the shaded areas show areas where that curbside right-of-way have exceedances of either the State's 0.49 or EPA1s 1.0 criteria, so the shaded area shows everywhere we had an exceedance and that's why we're recommending at those locations, we need to do additional samplings.

Q You're saying that a house in the middle of the block with houses on either side could possibly have PCBs but their neighbors not? Is that basically, you know...

A It is possible, and what we saw on the cleanup of the homes on Spicer and Delmore Avenue, and some people are well aware, their neighbor's property was cleaned up because they had elevated levels of PCBs on their property whereas their property didn't have those levels of PCBs and did not require a cleanup, so when we find PCBs on one property on a block, it doesn't mean that the whole entire block or that whole entire area had those high levels of PCBs.

Q So you said you sampled, but how are you determining that you're going to resample these certain areas when my house is in the middle of this area, you're resampling on either side of me, and how do I know that my property isn't the one that doesn't have the PCBs?

A The simple answer to that is if you want your property sampled, we'll sample your property. So, say, the purpose of this is to say there are certain homes that we need to take another look at because we have some limited data that we're not sure is representative of the property or not. There is no need, however, to sample every single home on these 13 streets;

however, if you're concerned because either your property wasn't sampled or you just want to be reassured because your neighbor has some elevated levels and their property is being sampled, we can also, if you want, have your property sampled.

Q I think during the original criteria six years ago, and I don't have the sampling results with me, that we were within the range of PCBs, but when you've got people who've got properties on either side of you, it makes you wonder if in the five or six years that you did the original sampling, has anything changed?

A Sure, and that's why what we're saying tonight is if you want additional sampling, we are offering it.

Q Give you a call?

A Give me a call and we'll arrange for the additional sampling.

Q Thank you.

QUESTION BY JOE DEKAS:

Q I live on Delmore Avenue right across from an area there that's going to be

resampled. Now, when I bought my property, I had topsoil put on it. Is that going to show up when you go through the testing?

MR. PRINCE: We'll figure out where the topsoil is and sample below it.

MR. MANNING: We've gone in some other properties because we brought in new, clean fill for a regrading or whatever. Before we actually do the sampling on your properly, we'll talk to you. If you tell us that you brought in clean material, we will try to target that area where the historical soil is and sample that area, but we would have to talk to you first and with your cooperation, we'll be able to target certain areas.

Q I did most of my property with topsoil.

A We can work around that.

Q I think they took the samples in front, originally, and I think they came back and said there wasn't any problem.

A Before we do any additional sampling, we could discuss the work that you did on your property and work around that.

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QUESTION BY ROBERT BARNARD:

Q I want to ask you the question, I purchased my house in 2000. I know there was testing in '97. There was, I guess, an average of 0.61 on my property. How contaminated am I, and my son is 14 and running around the property if there are PCBs there? I have a garden there, I ate tomatoes out of it, I mowed the - lawn a thousand times. How much am I contaminated and my son running around the property?

A As we said, DEP has set a national policy on a cleanup criteria that protects the environment of l part per million, so any number below that, EPA is saying is safe.

Q And 0.49 is a state standard?

A It's a state standard and they use different assumptions coming up with that. It's a risk-based number - and we have our risk assessor here, Marion Olson, who can talk a little bit more about the cleanup criteria.

MS. OLSON: I think we need to clarify that this number, the 1 ppm, is based on the assumption of a young child between the ages of zero and six being exposed 350 days a year for

six years, so we're building into and also building in the fact that young children are known to do more picking-up activity and with young children, everything goes into the mouth. We built that in in terms of the amount of soil that's ingested by that child, so that's built into it. We also looked at other health effects as well, and again, 1 ppm is protective looking at 30 years of exposure, 6 years as a child, 24 years as an adult, 350 days per year for that whole period, so we built in all of that in terms of frequency and the amount of PCBs that would be ingested.

Q Is that the only way to get them in your body is to eat them; can you touch them and inhale them?

A Yes. The number also looked at dermal exposure, so if you get it on your hands, there's a potential for it to be absorbed into the skin as well, and volatilization is not a problem.

MR. MANNING: Before we go to the next question, to answer your question regarding the average concentrations at the

Roosevelt School, the average PCB concentrations were 0.057 for PCBs. The maximum concentration detected of the samples collected was 0.26 parts per million and the minimum was 0.01 parts per million, but the average of the whole property was 0.057.

Q What was the highest?

A 0.26.

QUESTION BY STEPHANIE DeMICO:

Q Our property is one of the properties that had been reported as 0.4 parts per million and we had a garden and we've been eating from it for the past ten years. I also have a dog that goes in the backyard and brings the dirt in the house, so how safe is that 0.4 parts per million?

ANSWER BY MR. MANNING:

A I'd like to say, first, there was one sample point in the rear of the property that had a concentration of 44 parts per million, and when you look at the samples surrounding that, they were below — I believe almost all of

them, with the exception of one, were below the one part per million number.

MS. OLSON: Exactly what we look at when we do our analysis is that someone has random access to all the different parts of the site, and we incorporate that into our information as to the average concentration that's found. We actually use the upper confidence level on the mean. It's just a statistical term to make sure it would be even more protected. I think this property is being evaluated for remedial action at this point. We don't see an immediate threat, but there will be action being taken.

Q What do you mean by "immediate"?

A Meaning that PCBs are known to cause effects over long periods of time. We don't see effects right away. It would take a very long period of time. That's why we build in those assumptions as part of our assessment.

Q Five years, ten years?

A Again, we're looking at longer periods of time. We're also not looking at your being in that one area for that whole time. You

can go to other parts of the property where your levels are way below 1 ppm, but again, we are going to be looking at further remedial action at that property.

Q Just one more question. What were the levels on Arlington Avenue where that whole area is going to have additional sampling?

MR. MANNING: Mostly on the properties on that block that you're describing we only collected the curbside right-of-way, and on that block, there's quite a few exceedances of the State's 0.49 criteria and our 1.0 criteria, so we're calling for more extensive sampling of the entire block because there was a pattern there of higher exceedances of that 0.49 number than any other area that we were sampling on the curbside right-of-ways.

Q Were they higher than where our property is?

A No.

MR. PRINCE: Most of these samples are in the 1 to 5 ppm range, relatively low.

MR. MANNING: Take that range

down a little bit. It was between 1 and 2 parts per million in the curbside right-of-ways.

Q They didn't even test our garden, and we've been eating out of that for ten years.

MR. MANNING: What we typically found on that block, there's one sample that's 45 parts per million on your property. That was one of the highest concentrations of PCBs that was found in that whole group of 800 samples that we conducted. I think there's only one or two other higher concentrations on property that was directly adjacent to the Industrial Park, so that 44 parts per million is not representative based on the sampling we did on your whole entire block, but we did collect between 18 and 20 samples on your property and there were only, I think, two or three that exceeded —

Q I think it was 9 —

A 2.1 on the curb and then there was maybe another one in the rear of property.

Q 1.2.?

A Correct, and then the rest of them were well below our cleanup criteria, so it

is an area we are going to address; however, based on what we saw in the data, that 44 parts per million is not representative of what's on your property or on some of the surrounding properties.

QUESTION BY MR. HOGAN:

Q Can you tell me a hundred feet downstream of the dump about the water samples?

A We collected surface water samples and we collected sediment samples from the Bound Brook corridor. I don't have that data on me. If you want, afterwards, I can locate that and let you know that, but to answer your question, yes, there are PCBs in that Bound Brook corridor a hundred feet.

Q The dump keeps filtering it out. That dump is 13 feet deep. I know it, and they used to burn the debris and that's what contaminated all the area with the smoke. The smoke contained PCBs and it went all over the place.

ANSWER. BY MR. MANNING:

A If you want, we can talk about

it a little bit more after the meeting.

Q You're going to have another meeting before you proceed, right?

A Yes, we are, but I don't want to you to have to wait until our next meeting to have your questions answered. I would love to answer everyone's questions tonight, but it's starting to get late and I know people want to get home and some people may or may not have an interest in the Industrial Park, so let's try to stay focused on the residential properties.

QUESTION BY MR. LARRY RANDOLPH:

Q Larry Randolph, South Plainfield Environmental Commission. On the curbside right-of-way sampling, what methodology is that; are you sampling the gutters or the middle of the road or the property adjacent to the curbs?

ANSWER BY MR. MANNING:

A Basically, what we're looking at was a couple of feet from the curb where, typically, there would be a sidewalk, but most of those properties don't have sidewalks, so what we were doing was in the sodded areas, we were

lifting the sod up and collecting a sample of soil from directly underneath the sod a couple of feet from the curb, and we followed that uniform process on all of the right-of-ways that we sampled,

Q Are you looking in the catch basins?

A We didn't collect any samples from any sediments on the catch basins from the right-of-ways. That is something that I guess we could look at in the next design phase, but you have to keep in mind — actually, I am mistaken. There was some limited sampling on catch basins on Hamilton Boulevard because of work of a utility company who was doing it and they were collecting samples, and based on that sampling event, there was no PCBs found in the surface water runoff coming from the street; but keep in mind, most of these properties, residential properties, are vegetated. Most people have sod on their lawns, on their properties. The PCBs are not at the surface on that sod. They are at the soils beneath it, so for the soils to percolate up through the ground above this soil,

above the sod, and then to run off on the street, that's not something that you see commonly on a daily basis occurring on a residential property.

But to answer your question, there was one sampling event, and we did not find a problem. Did we do it on all the blocks? No.

Q Is there any plans to do it?

MR. PRINCE: We can look into it. It might make sense.

Q Second question, the Borough has a street-sweeping program. Should we be doing anything different in this area?

A No.

QUESTION BY ALICIA CIACUPO:

Q Are there any other contaminants that we should be concerned about besides PCBs, such as solvents?

ANSWER BY MR. MANNING:

A No. The initial sampling we did in 1997, we did a broad sweep to see what the problem was, was it just PCBs. Based on the initial sampling, we saw it was only a PCB-related problem of the residential

properties.

QUESTION BY MR. BOB SPIEGEL:

Q The homes that we know are impacted that are going to require cleanup, do you think it would be prudent to put up some type of snow fencing or something around the areas that you know need to be remediated to keep people off of them until such time as they are remediated?

ANSWER BY MR. MANNING

A No. There's no reason to restrict access on any of the properties that we know require a cleanup. Keep in mind, yes, people do have gardens, they are in contact with some of the soil as we already discussed, but most of the properties have some form of sod or vegetation on them, so in most cases, there isn't a direct contact; but in those cases where there is the potential for exposure in the gardens and in some of the flower beds, based on the concentrations, we looked at that and there was no need to restrict any access at this time. People can continue using their properties.

Q Just to bring back a point that

originated and a couple of people agreed, how much cost would it be for EPA to install some monitoring along the fence line to see if there was, indeed, contaminants leaving the site, because we do differ about what you consider to be a vegetative cover.

I've been to the site many times and yes, you're right, there has been a lot of improvement in the site. The main parking lot is paved. There is another area, though, off to the side where they are using trucks still in and out that's not paved that generates dust. There's like moving trucks or some type of trucks in there. If you go on the back of the property, there is an area that's not paved that's still being used and the grassy area in the back is not — well, the whole back of the property, there's still a lot of exposed areas, so can EPA install one or two dust monitors there just to say, "Gee whiz, do we know if there's anything coming off the site?"

We have no data, but if you were to go ahead and collect a couple of weeks or months of data, you'd know if there was any

exposure or any continual release of contaminants from the site.

A I don't think I can commit to do an air monitoring right now, but when we go back over the next couple of days, we can look at doing this. You raise a point of what would it cost. We are not here taking some actions and not taking other actions because of what would it cost the agency to do the additional air monitoring.. We' re going to do the work that’s necessary to insure that everything we do is being protective of the residents and of the environment; so it's not an issue of cost on why we haven't done the air monitoring. I guess over the next couple of days, we can make a decision. I know I can't commit to say that we are going to have air-monitoring stations along the fence line tomorrow, but what I can commit to you is you spoke about areas that aren't paved where trucks are using. I've been at that site quite a few times. I'd love to meet you at the Industrial Park at any time and show me these areas because —

Q What are you doing tomorrow?

A I'll meet you there tomorrow afternoon.

Q Okay, that's fine. The last question, the groundwater plume that's under the site, we know that it's bad. We know that the solvents are pushing the PCBs into the groundwater at unheard of levels. Do we know that the plume is not extending into the residential area? You said that some of the areas have wells that were closed previously by the DEPE. Do we know that there's not an indoor air-quality problem as a result of a groundwater plume coming from this site in the residential areas?

ANSWER BY MR. MANNING:

A That isn't a question for Operable Unit 3, but if no one else has any other questions on the residential plan that we just discussed here, I guess we can move into other areas.

Q Will it affect the homes, though? Will it affect people's houses? It may not be their front lawns, but it's their basements.

A I understand that, and we are going to be doing additional air monitoring at the residential properties for vapor intrusion.

Q So you are going to go into people's basements and check for —

A We plan as part of the investigation for Operable Unit 3, which deals with the groundwater and the Bound Brook corridor, to see as a result of the groundwater and the trichlorethylene that we have in the groundwater, whether or not they're volatilized and impacting residents, as you say, with the vapor intrusion. We are going to be doing that sampling.

Q When is that going to happen?

A That's going to begin this summer with the groundwater sampling, the Bound Brook sampling and Operable Unit 3.

QUESTION BY BILL SHULTZ:

Q Regarding Operable Unit 3, you've got some PCB contamination into the Bound Brook. I have a problem. I've actually been contacted by people who are kayaking and canoeing

in the Bound Brook. You've got contamination there. Until you come up with a definitive plan, can we at least some get some signage maybe on the streets crossing the Brook that there is contamination in the Brook and they should — I mean aside from the fishing, the fish warnings are throughout the state and that's another curse that we have to deal with, but everybody's getting so used to seeing the fish warning signs all over the place, they may not necessarily realize we've got some contamination in the waterway, and other recreational users have to be addressed.

We get further downstream, the place is just covered with ATV tracks, and the floodplain itself has different characteristics in that because the trees have fallen over and they've created craters and such, you have hydrologists that are looking at the floodplain and realizing that there are places that are absolutely clear, and the flushing point further downstream, especially like where the stream comes up into New Market Lake, that's where something things will settle. I'm not exactly familiar with the characteristics of the PCBs in

the stream corridor, but I'm hoping that you're looking down as far as the lake.

ANSWER BY MR. MANNING:

A We sampled just beyond New Market Pond as part of this ongoing investigation, and regarding putting up signs that discuss restrictions for the use of the waterways other than fishing, I would have to go back and double-check, but I don't. believe the data supports the need for any type restrictions like that.

Before the implementation of the site-stabilization measures that were implemented at the Industrial Park in 1997, the surface water samples revealed elevated levels of contamination that were coming off of the Industrial Park. Measures were implemented in 1997 to restrict and prevent that continued migration. Additional samples were conducted after that as part of our ongoing investigation of the Bound Brook corridor, surface water samples and additional sediment samples, and the quality of the surface water changed after the implementation of those measures.

So to answer your question, I can work with the Borough in South Plainfield if they want additional signs posted for the Bound Brook corridor for the fish and hunting advisory. As of now, there are no advisories posted for contact with that pond, the water body.

Q Two things. There are very few of the fish consumption advisories left. They've all been torn down. Two, some things about kayaking in the Bound Brook. There are numerous strainers where trees have fallen into the stream. This is one of the few streams where you spend just as much time pulling your kayak around the fallen trees, but this necessitates that if you're going to canoe or kayak in the Bound Brook, you're going to have physical contact with the sediment. You're going to have to get off, you're going to have to step in the mud and you're going to have to walk on the muddy banks as opposed to other streams where you get in the water and you're gone and all you have to worry about is waterborne contaminants. Here, people are going to be exposed to the sediment contaminants, so keep that in mind.

ANSWER BY MR. MANNING:

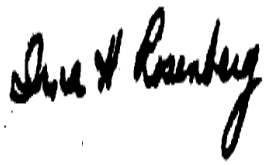
Q I'll answer that question real quickly and then we'll take a break, but based on the evaluation of the data, the recreational user is not impacted by occasional contact with the sediment of the Bound Brook corridor, and if you'd like, afterwards, you can give me your fax number and I can fax you the report on that, but right now, if there's no other questions —

MR. PRINCE: Let me put it this way. Our intent at this point was that our stenographer has been working very, very hard. We've been collecting oral comment on our proposed remedy that we are required to collect, and if there are any other oral comments that you would like to have on the record, this would be an opportunity to do it; but we would offer to stay after she stops and rests her fingers and we would offer to stay and talk about either OU1, Operable Unit 1 or other parts of the plan, so if there are any other comments of that nature, thank you very much.

(Meeting adjourned.)

C E R T I F I C A T E

I, IRNA H. ROSENBERG, a Notary Public and Certified Shorthand Reporter of the State of New Jersey, do hereby certify that that the foregoing is a true and accurate transcript of the testimony as taken stenographically by and before me at the time, place and on the date hereinbefore set forth, to the best of my ability.



IRNA H. ROSENBERG
Notary Public of the
State of New Jersey

My Commission Expires 5/26/06

# ATTACHMENT D

# WRITTEN COMMENTS

ENVIRON

July 16, 2002

Via e-mail

Mr. Peter Mannino
Project Manager
USEPA, Region II
290 Broadway, 19th Floor
New York, NY 10007-1866

Re: Cornell-Dubilier Electronics Superfund Site/Hamilton Industrial Park Site
OU 1 Proposed Plan

Dear Mr. Mannino:

On behalf of the Hamilton Industrial Park Group (HIPG), comprised of Cornell Dubilier Electronics, Inc. and Dana Corporation, I am providing these comments to EPA's June 2003 Proposed Plan for Operable Unit 1 (OU1). First, I am resubmitting a summary of the Hamilton Industrial Park Group's August 28, 2002 comments on the OU 1 RI/FS reports for your consideration. In general, HIPG does not believe that the concerns identified in the August 28, 2002 letter regarding the data evaluation and remedy scoping presented in the RI/FS were addressed by the Proposed Plan. Second, according to the Proposed Plan, USEPA has changed the scope of work from the one defined in the FS, including increasing the number of properties requiring additional sampling or further evaluation. Based on our recent discussions, I understand that this change was prompted by USEPA's use of a NJDEP cleanup criterion of 0.49 mg/kg rather than USEPA's cleanup criterion of 1 mg/kg. Because the NJDEP soil cleanup criterion has not been promulgated, and thus is not an ARAR, and given that USEPA does have a regulatory basis for selecting a cleanup criterion of 1 mg/kg, the HIPG strongly opposes basing the scope of work defined in the Proposed Plan on NJDEP's cleanup criterion. In fact, the NJDEP's publication of this criterion specifically states that this criterion "shall not be assumed to. . . represent the Department's opinion that a site requires remediation". Furthermore, the need for remediation should be based on site-specific risk analysis rather than a non-promulgated generic cleanup criterion.

Please call me at 609-243-9859 if you wish to discuss these comments.

Sincerely,
On behalf of the Hamilton Industrial Park Group

J. Mark Nielsen, P.E.
Manager

jmn:02-5840f3\\PRAP Comments(7-16-02).doc

Enclosure

cc: K. Stollar, Esq., Foley Hoag
M. Last, Esq., Rackemann, Sawyer & Brewster
M. Scott, ENVIRON

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ENVIRON

August 28, 2002

**Federal Express**

Mr. Peter Mannino
Project Manager
USEPA, Region II
290 Broadway, 19th Floor
New York, NY 10007-1866

Re: Cornell-Dubilier Electronics Superfund Site/Hamilton Industrial Park Site
OU 1 Remedial Investigation and Feasibility Study Reports

Dear Mr. Mannino:

Based on our recent discussions, I understand that USEPA is preparing to publish a preliminary remedial action plan (PRAP) for Operable Unit 1 (Off-site Soils) associated with the Cornell-Dubilier Electronics Superfund Site based on the findings of the remedial investigation and feasibility study (RI/FS) reported in August 2001 by Foster Wheeler Environmental Corporation. In anticipation of the release of the PRAP for Operable Unit 1, I have enclosed a summary of the Hamilton Industrial Park Group's comments on the RI/FS reports for your consideration.

Please call me at (609) 243-9859 if you should have any questions regarding the enclosed comments.

Sincerely,
On behalf of the Hamilton Industrial Park Group

J. Mark Nielsen, P.E.
Manager

jmn:02-5840f3\\Transmittal(8--28-02).doc

Enclosure

cc: M. Conyngham, Esq., Foley Hoag
M. Last, Esq., Rackemann, Sawyer & Brewster
M. Scott, ENVIRON

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# COMMENTS ON THE RI/FS FOR OU-1: OFF-SITE SOILS
# CDE SUPERFUND SITE, SOUTH PLAINFIELD, NEW JERSEY

**Remedial Investigation Report**

Reference: *Final Remedial Investigation Report for Operable Unit 1 (OU-1), Off-Site Soils for the Cornell-Dubilier Electronics Superfund Site, South Plainfield, Middlesex County, New Jersey* (Foster Wheeler Environmental Corporation, August 2001).

Section 1.2.2

- Insufficient information is provided regarding the use of the Hamilton Industrial Park after 1962 to assess other sources of contamination or site activities that could have contributed to potential transport of contamination to off-site locations. In particular, a truck driving school operated on the Hamilton Industrial Park site up until the mid-1990s and an auto junkyard was located between this property and Spicer Avenue during the early 1960s. Post-1962 aerial photographs suggest continued disturbance of the ground surface in the undeveloped portion of the Hamilton Industrial Park site (e.g., March 1969).

Section 1.2.3

- Insufficient information is provided regarding the history of the residential property development. In particular, sampling and removal action activities uncovered buried debris - how did this material come to be present on these properties? A review of aerial photographs suggests that some of the homes in this area are not the original structures on these properties - when were the current homes constructed?

Section 2.2

- The OU-1 RI Work Plan (Foster Wheeler 2000) stated that 36 properties were targeted for sampling during the RI.
  - How were these initial 36 properties selected for sampling (e.g., previous sampling, adjacent to other contaminated properties, etc)?
  - What was the basis for reducing the number of properties sampled to 20 as reported in the RI Report?
  - Five of the 20 properties sampled as part of the RI were not part of the original 36 properties selected in the Work Plan. What was the basis for changing the actual properties to be sampled?

- What was the overall sampling strategy for selecting sampling locations at each property, including the locations for collecting the deep soil samples? (For example, on Property 19 all deep samples were concentrated in one area and on six properties the collection of deep samples varied from the general approach of collecting one deep sample for every five shallow samples).

Section 4.0

- The RI suggests that "nearby areas were suspected to have the potential to be contaminated with PCBs, via airborne entrainment of contaminated particulates (i.e., fugitive dust emissions) and/or transport by vehicles." However, deep soil contamination (e.g., below 1-foot) and evidence of fill material was also observed on sampled properties, which suggests that there are other/additional mechanisms by which contamination may be present on these properties (see Section 3.4.2). Were additional mechanisms for the presence of PCBs on these properties also considered in developing

the potential scope of the investigation? For example, the 1969 aerial photograph suggests disturbance of the ground surface in the undeveloped portion of the Hamilton Industrial Park site.

Section 4.1

- The RI Report indicates that an additional property was to be remediated under the removal program by the end of 2001. Was this work completed?

Section 4.4.17

- Why was Property 17, which had been characterized as part of the Tier II removal action program, resampled as part of the RI? Why was this sampling targeted to a specific 2-inch depth interval?

Section 4.5

- Results for Tier n Property DD should be noted as reflecting results for a sample having elevated detection limits, and the 95% UCL for this property excluding this data point should also be presented. These results were discussed in Section 2.3.7 of the *Tier II Residential Property Removal Action Final Report, South Plainfield, New Jersey* (ENVIRON, January 2000). According to USEPA's Risk Assessment Guidance -Part A, elevated detection limits should be censored if these values would cause the calculated exposure concentration to exceed the maximum detected concentration.

Section 5.2.1

- This section refers to "improper" disposal practices. The nature of the disposal activities should be discussed in terms of the "state of the practice" at the time these activities may have occurred (i.e., what was the required or common industry practice at the time these activities reportedly occurred?).

Section 6.3.1

- The RI Report acknowledges that current land uses will likely continue into the future. However, it is then assumed for the human health risk assessment that all properties could be used for residential purposes. This contrarily assumes that current uses would change in the future. This assumption should be confirmed on a property-by-property basis before proceeding with remedial decision making. **For example, both Property 1 and Property 18 are currently commercial-use properties, and given the Borough of South Plainfield's formally adopted commercial redevelopment plan for this area, it would appear extremely unlikely, as well as inconsistent with the local redevelopment and land use planning, that these properties will be converted to residential use in the future.** (A copy of the *Redevelopment Plan for the Designated Redevelopment Area in the Vicinity of the Hamilton Boulevard Industrial Site* ["Redevelopment Plan"; THP, April 2002] and the Borough of South Plainfield's Ordinance #1597 approving this Redevelopment Plan are provided as an attachment to these comments.)

  If it is assumed that the current land uses will continue into the future, then the risks to indoor workers at the commercial properties would be lower than those calculated under a residential land use scenario, and as a result, Properties 1 and 18 would likely not be identified for remediation (the RME risk estimates for an adult resident only marginally exceeded an HQ of 1.0 for Property 18, and were within the acceptable cancer risk range for both properties). For example, using standard defaults (Supplemental Soil Screening

Guidance; USEPA draft 2001), the risks to indoor workers at Properties 1 and 18 would be:

| | | |
|---|---|---|
| | | 2 |
| Property 1: | HQ = 0.06 | CRL = $8 \times 10^{-7}$ |
| Property 18: | HQ= 1 | CRL= $1 \times 10^{-5}$ |

This indicates that, if current and reasonably likely future uses were considered in the risk assessment (given the Borough of South Plainfield's promulgated redevelopment plans for this area), remediation of Properties 1 and 18 would not be warranted.

**Feasibility Study**

Reference: *Final Feasibility Study Report for Operable Unit 1 (OU-1), Off-Site Soils for the Cornell-Dubilier Electronics Superfund Site, South Plainfield, Middlesex County, New Jersey* (Foster Wheeler Environmental Corporation, August 2001).

Section 1.2.2.1

- Insufficient information is provided regarding the use of the Hamilton Industrial Park after 1962 to assess other sources of contamination or site activities that could have contributed to potential transport of contamination to off-site locations. In particular, a truck driving school operated on the Hamilton Industrial Park site up until the mid-1990s and an auto junkyard was located between this property and Spicer Avenue during the early 1960s. Post-1962 aerial photographs suggest disturbance of the ground surface in the undeveloped portion of the Hamilton Industrial Park site (e.g., March 1969).

Section 1.2.2.2

- Insufficient information is provided regarding the history of the residential property development. In particular, sampling and removal action activities uncovered buried debris - how did this material come to be present on these properties? A review of aerial photographs suggests that some of the homes in this area are not the original structures on these properties - when were the current homes constructed?

Section 1.2.3.2

- Three of the 19 properties sampled during the RI were determined to need remediation based the findings of baseline risk assessment. Additionally, 16 Right-of-Way (ROW) samples collected during the RI and Tier HI removal action investigation (4 property ROWs sampled in May 1998) exhibiting PCB concentrations above the EPA Soil Screening Level (SSL) of 1 mg/kg were identified. EPA assumed an additional 25 properties will need to be sampled based on a location adjacent to ROWs with elevated PCB levels, and/or along major thoroughfares exiting the Site. It is unclear where these 25 properties are located and specifically how these properties were selected. The criteria for identifying these properties are fundamental to the remedy analysis and selection, and will ultimately be necessary for moving forward for remedy implementation.

Section 1.2.4

- The first paragraph of this section suggests that the principal transport mechanism that resulted in PCB contamination on off-site properties is via contaminated particulates (i.e., fugitive dust emissions) and/or transport by vehicles. However, deep soil contamination (e.g., below 1-foot) and evidence of fill material was also observed on sampled properties, which suggests that there are other/additional mechanisms by which contamination may be present on these properties (see Section 3.4.2). For example, the 1969 aerial photograph suggests disturbance of the ground surface in the undeveloped portion of the Hamilton Industrial Park site.

Section 1.2.5

- The fourth paragraph summarizes the results of the human health risk assessment for Properties 1 and 18 based on an assumption of residential use of these properties. The RI Report acknowledges that current land uses will likely continue into the future. However, it is assumed for the human health risk assessment that all properties could be used for residential purposes. This contrarily assumes that current uses would change in the

future. This assumption should be confirmed on a property-by-property basis before proceeding with remedial decision making. For example, both Property 1 and Property 18 are currently commercial-use properties, and given the Borough of South Plainfield's formally adopted commercial redevelopment plan for this area, it would appear extremely unlikely, as well as inconsistent with local redevelopment and land use planning, that these properties will be converted for residential in the future. If it is assumed that the current land uses will continue into the future, then the risks to indoor workers at the commercial properties would be lower than those calculated under a residential land use scenario, and as a result, Properties 1 and 18 would likely not be identified for remediation.

Section 2.4.3.5

- The first two subsections discuss possible management of excavated soils as RCRA hazardous. Soils containing PCBs as the only contaminant are not RCRA regulated hazardous wastes.
  - Is there any evidence that the soil to be remediated will be characteristically hazardous under RCRA?
  - Why are RCRA landfill requirements rather than TSCA landfill requirements discussed in this section?
  - How would PCS concentrations be used to determine the need for a RCRA Subtitle C landfill versus a TSCA landfill? A better comparison would be to assess the need for a Subtitle D landfill versus a TCSA landfill based on PCS concentrations.

- The second two subsections discuss the possible management of excavated soils as non-hazardous/non-TSCA regulated. The assessment of these management options fails to consider the placement of non-hazardous/non-TSCA regulated soils on the Hamilton Industrial Park site. While this management approach was considered in terms of construction of a RCRA/TSCA landfill cell on the Hamilton Industrial Park Site (see first subsection), it is not considered as an option under the subsection entitled "On-site Non-Hazardous/Non-TSCA Disposal." Given the planned redevelopment of the Hamilton Industrial Park site, these soils could be integrated into the grading associated with an on-site remedial option.

Section 3.2.2 and 3.2.3

- Alternatives 2 and 3 incorporate the cleaning of the interiors of homes based on pre-design interior dust sampling.
  - What are the Remedial Action Objectives and PRGs for interior dust?
  - What are the remedial technologies considered for addressing the interiors of homes? What remedial technologies were screened to determine that these are effective technologies?

Section 4.2

- What was the basis for assuming that 12 of the additional 25 properties (48%) to be investigated during the pre-design studies would need some remediation when only 3 of the 19, or 16%, sampled during RI were identified for remediation?

- What is the basis for assuming that 7 additional properties would need interior dust cleaning?
  - Was sampling of interiors performed during the RI?

- What type of sampling is proposed for the pre-design studies?
- What concentration will trigger the need for interior cleaning, and how will the effectiveness of the cleaning be determined?

- Were the implementation risks associated with the transport of excavated soils along local roads quantified?

- Why was an excavation depth of 2-feet assumed for any potential property excavations (i.e., those properties that are to be sampled during the pre-design studies)? As reported in the *Tier I Residential Property Removal Action Final Report* (ENVIRON, July 1999) and *Tier II Residential Property Removal Action Final Report* (ENVIRON, January 2000), most excavations conducted during the removal action program were 1-foot in depth or less.

- The following assumptions appear to be inconsistent with the general approach presented in Appendix C.

  Specific Excavation Area Comments:
  - Area 1B: Sample RS01-04 is 1.2 mg/kg at 16-18", but the excavation is assumed to be a 1 foot depth (See Fig. C-l)
  - Area 13 A: only one of the two subsurface samples is greater than 1 mg/kg, yet the entire 756 sf area is assumed to be a 2 foot deep excavation (See Fig. C-2)
  - Area 18 A: only one of the two subsurface samples is greater than 1 mg/kg, yet the entire 6,616 sf area is assumed to be a 2 foot deep excavation (See Fig. C-3)

- Cost Estimation:

  - General:
    1. What is the basis for the cost to clean interiors of houses of $20,000/home (See Table B-2 and B-3)?

August 28, 2002

# ATTACHMENT

# Redevelopment Plan for Hamilton Boulevard Industrial Site

BOROUGH OF SOUTH PLAINFIELD
2480 Plainfield Avenue
South Plainfield, NJ 07080

AREA CODE 908
Mayor's Office - 226-7601
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Public Works - 755-2187
Recreation - 226-7713
Recycling - 226-7621
Social Services - 226-7625
Tax/Sewer - 226-7610

July 16, 2002

Mr. Anthony Valasquez
Hill Wallack, Attorneys At Law
202 Carnegie Center
Princeton, New Jersey 08543-5226

Dear Anthony:

Enclosed please find a certified copy of Ordinance #1597, approving the Redevelopment Plan for the Hamilton Boulevard Industrial Site.

If you have any questions, please contact me at (908)226-7606 from 8:00 AM to 4:00 PM, Monday to Friday.

Thank you.

Yours truly,

Vincent Buttiglieri
Municipal Clerk

847590211

# ORDINANCE NO. 1597

## AN ORDINANCE ADOPTING THE REDEVELOPMENT PLAN FOR THE DESIGNATED REDEVELOPMENT AREA IN THE VICINITY OF THE HAMILTON BOULEVARD INDUSTRIAL SITE.

**WHEREAS,** the Borough Council of the Borough of South Plainfield, by Resolution dated February 21, 2002, designated and declared that the area commonly known as the Hamilton Boulevard Industrial Site, is an area in need of redevelopment, as that term is recognized and utilized within the Local Redevelopment Law, N.J.S.A. 40A:12A-1 et seq., and

**WHEREAS,** the Borough Council caused to be prepared a proposed "Redevelopment Plan", as authorized pursuant to N.J.S.A. 40A:12A-7, and

**WHEREAS,** the Borough Council forwarded the proposed "Redevelopment Plan" to the Planning Board of the Borough of South Plainfield, pursuant to N.J.S.A. 40A:12A-7(e) for its review and report, and

**WHEREAS,** the Planning Board considered the "Redevelopment Plan" at its open, public meeting on June 11, 2002, and approved of the same, and reported favorably to the Borough Council with regard to the adoption of the "Redevelopment Plan".

**NOW , THEREFORE, BE IT ORDAINED** by the Governing Body of the Borough of South Plainfield, County of Middlesex, State of New Jersey, as follows:

**SECTION 1.** The "Redevelopment Plan for the Designated Redevelopment Area in the Vicinity of the Hamilton Boulevard Industrial Site", annexed hereto in its entirety, is hereby adopted and shall be incorporated into the land use laws of the Borough of South Plainfield.

This Ordinance shall take effect after final passage and publication in accordance with the law.

### STATEMENT

The purpose of this ordinance is to adopt the Redevelopment Plan for the Hamilton Boulevard industrial Site area, so as to guide the planning, development, redevelopment and rehabilitation of the Hamilton Boulevard Industrial Site area, pursuant to and in accordance with the Local Redevelopment and Housing Law, N.J.S.A. 40A:12A-1 et seq.

Daniel J. Gallagher, Mayor

**ATTEST:**

Vincent Buttiglieri,
Municipal Clerk

**847590212**

*THP, Inc.*

# The Redevelopment Plan for the Designated Redevelopment Area in the Vicinity of the Hamilton Boulevard Industrial Site

## Borough of South Plainfield
## Middlesex County, New Jersey

**April, 2002**

Prepared for:

Borough of South Plainfield
2480 Plainfield Avenue
South Plainfield, New Jersey 07080

Prepared by:

*THP, Inc.*
40 Brunswick Woods Drive
East Brunswick, New Jersey 08816

Lester J. Nebenzahl, P.P., AICP

THP File No. 2001 02.110

847590213

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# INTRODUCTION

The South Plainfield Borough Council adopted Resolution Number 01-116 on April 19, 2001, which designated certain lands in the vicinity of the Hamilton Boulevard and the Lehigh Valley Railroad as a "Redevelopment Area" pursuant to the Local Redevelopment and Housing Law (N.J.S.A. 40A:12A-2et seq.).

The tract designated as a "Redevelopment Area" is illustrated on the attached map entitled "Exhibit 1, Study Area", and includes 21 individual tax lots with a total land area of approximately 29.38 acres. Table 1 presents a listing of all lots within the "Redevelopment Area" including current ownership and approximate acreage for each parcel.

As set forth in the preliminary report adopted by the South Plainfield Borough Planning Board, dated June, 2001, the majority of the area in need of redevelopment is comprised of Lot 1 in Block 256. This 25.4 acre tract contains numerous old buildings, some of which date back to the very early 1900's. The buildings are utilized as rented industrial space for a variety of small businesses and the site is also used to store moving vans. The property was placed on the United States Environmental Protection Agency's Superfund list in July, 1998 after approximately twelve years of soil, surface water and sediment testing. Large areas of the site were paved, a truck driving school was closed, the south and east sides of the lot were fenced and a drainage control system was installed in 1997 to limit movement of contaminants to the Bound Brook. Cornell-Dubilier Electric and the Dana Corporation, two former tenants and/or the former owner of the tract removed soil from the yards of thirteen dwellings in 1999 by agreement with the Environmental Protection Agency.

The remaining twenty lots comprise an area of 3.98 acres with six dwellings; one industrial use; six commercial facilities; the Borough police substation; five vacant parcels including a single Borough owned parcel; and, one semi-public use.

In the preliminary report, the Borough Planning Board noted that existing conditions within the designated area will continue to inhibit development of the individual parcels. These conditions include existing environmental problems, diverse ownership, and the overall condition of existing structures and varying land

use activities within the area. As determined by the Planning Board, these conditions meet the criteria for designation of the parcels as a "redevelopment area" pursuant to N.J.S.A. 40A:12-1 et seq.

Accordingly, inclusion of those parcels within the redevelopment area will allow for a comprehensive Redevelopment Plan and productive improvements which will promote the public health, safety and general welfare.

Based upon the above noted existing conditions, the preliminary report recommended that the designated redevelopment area be planned and developed with mixed uses which will be valuable for contributing to and serving the community.

## THE REDEVELOPMENT PLAN

The Redevelopment Plan presented on Exhibit 2 has been prepared in accordance with a "Conceptual Design Plan" prepared by Beacon Planning and Realty Advisors, L.L.C. in consultation with the South Plainfield Borough Governing Body. The Plan has been formulated to achieve the following goals and objectives:

- The "Redevelopment Plan" should be compatible with the Borough's Master Plan.

- Environmentally sensitive lands should be preserved.

- Grade-separated pedestrian linkage to the Historic Downtown District located north of the Lehigh Valley Railroad should be provided.

- Provide municipal parking to meet the off-street parking needs of future retail development within the redevelopment area as well as for nearby community businesses.

- Provide safe and efficient access to all uses within the redevelopment area while minimizing adverse impacts to existing residents in the area.

- Provide adequately landscaped buffer areas to aesthetically complement the development and buffer existing residential dwellings in the surrounding area.

- Provide the opportunity to work and shop within the redevelopment area while maintaining compatibility with existing development in the area.

- The scope of development should not overwhelm existing and/or proposed infrastructure.

The "Hamilton Boulevard Redevelopment Area" is proposed to be developed with six land use categories, as follows:

- Retail/Commercial

- Mini-storage

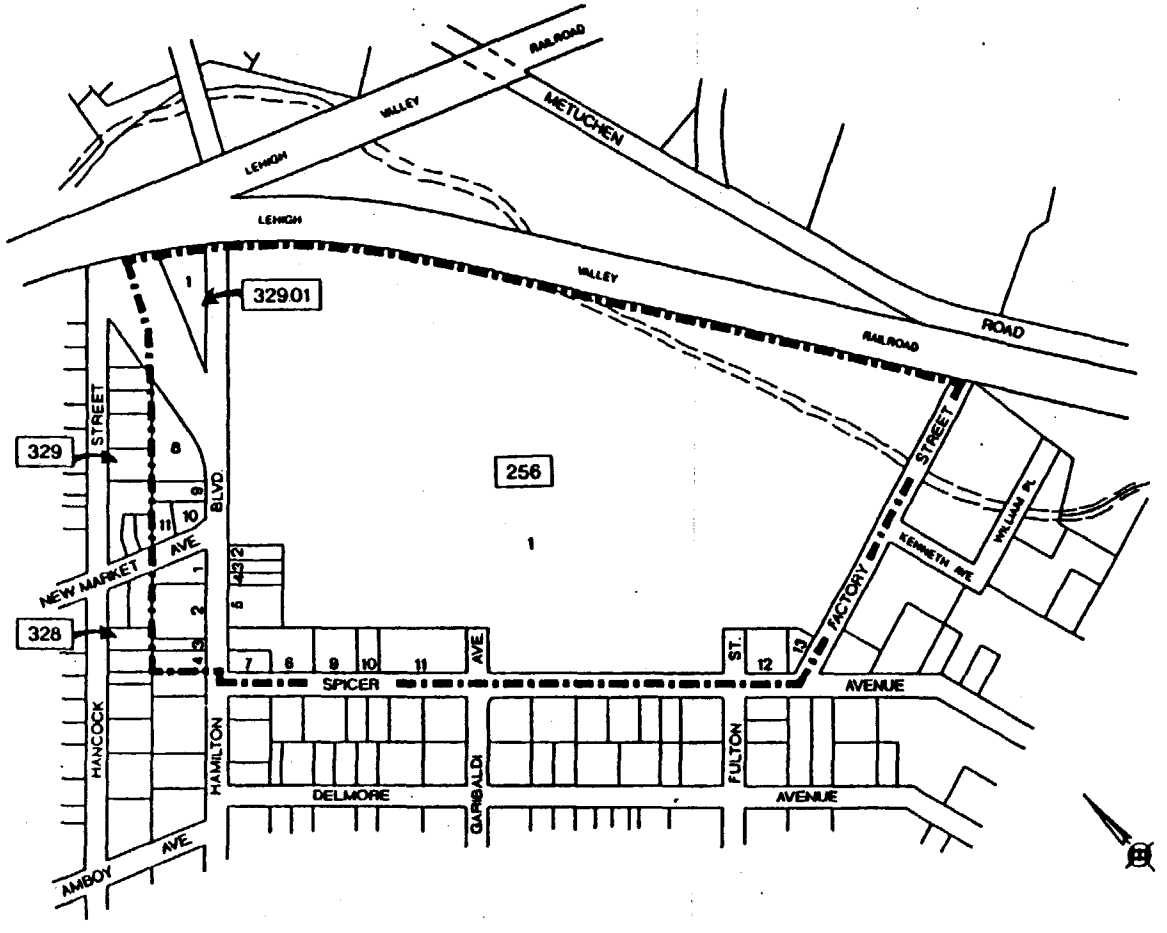
- Office/Warehouse

- Public Use/Street Intersection Improvement

- Semi-Public (existing use)

- Buffer/Conservation

As shown on the Redevelopment Plan, the northwest portion of the redevelopment area in vicinity of Hamilton Boulevard is proposed for retail and commercial development. Within this area presently, is a South Plainfield Borough Police sub-station which is proposed to remain. The sub-station is shown on the northerly corner of the New Market Avenue intersection with Hamilton Boulevard as a "Public Use" on the Redevelopment Plan. Access for the retail uses would be provided along Hamilton Boulevard, with internal access to on-site municipal parking provided in vicinity of the New Market Avenue intersection and also further northeast along Hamilton Boulevard.




GRAPHIC SCALE (in feet)

0 100 400

50 200 800

LEGEND:

[#] - EXISTING TAX BLOCK NUMBER

# - EXISTING TAX LOT NUMBER

▬▪▬ - STUDY AREA BOUNDARY

EXHIBIT 1

STUDY AREA

THP, Inc.

East Brunswick, New Jersey

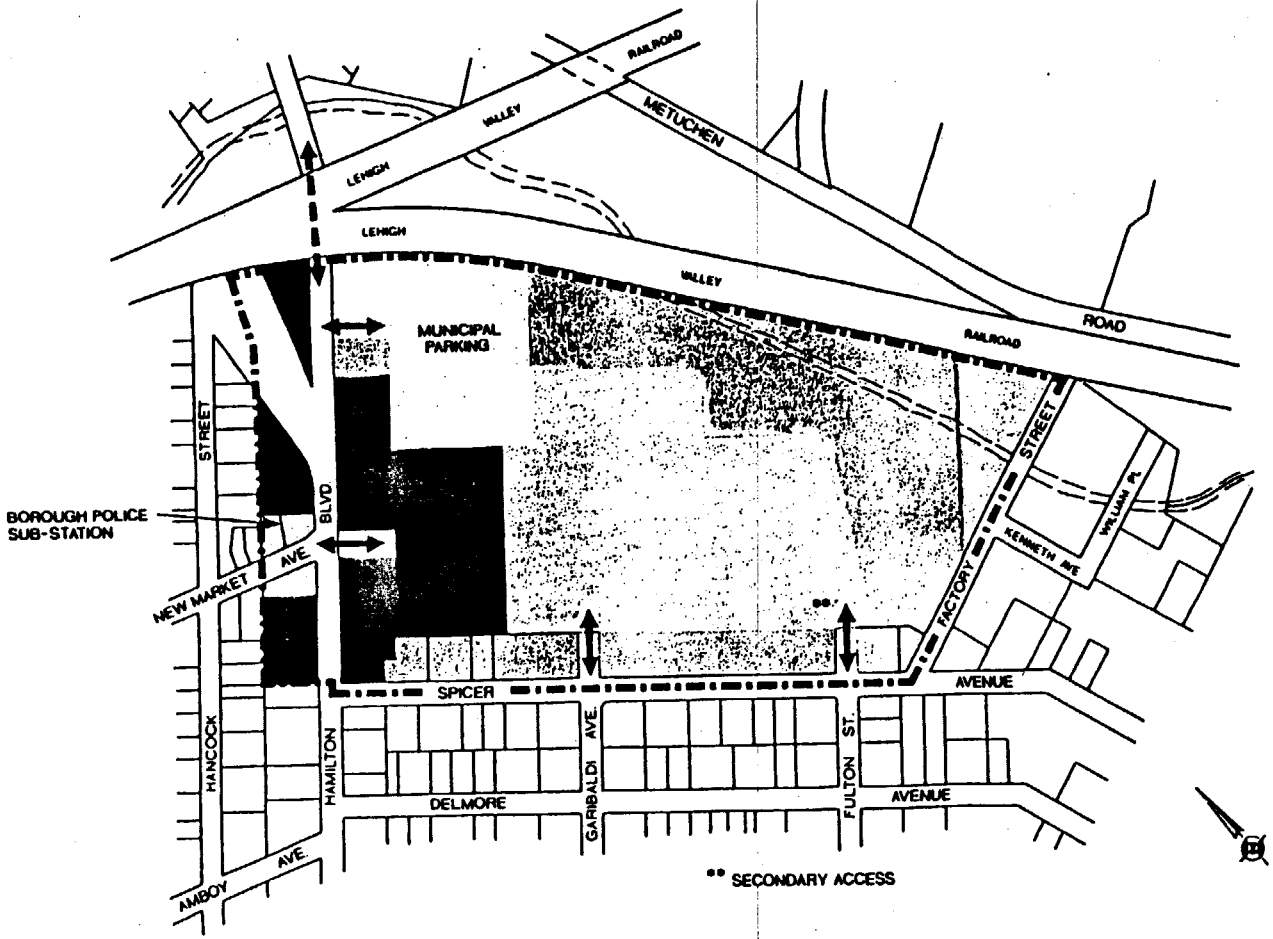
847590219

**Table 1**
**Redevelopment Area**
**(Tax Lot Parcel Identification)**

| Block | Lot(s) | Owner | Acreage (Approx.) |
|---|---|---|---|
| 256 | 1 | DSC of Newark Corporation | 25.4 |
| 256 | 2 | Morris Schechter | 0.08 |
| 256 | 3 | Adam Schechter | 0.08 |
| 256 | 4 | Jaipersaud and Babita Sewdat | 0.07 |
| 256 | 5 | Harry and Stella Cisz | 0.29 |
| 256 | 6 & 7 | Saverd Joint Venture, L.L.C. | 0.46 |
| 256 | 9 | Eugene and Angelina Pesaniello | 0.23 |
| 256 | 10 | John and Eugene Pesaniello | 0.11 |
| 256 | 11 | Eugene M. Pesaniello | 0.46 |
| 256 | 12 | Frank Riccardi, Sr. | 0.23 |
| 256 | 13 | Borough of South Plainfield | 0.10 |
| 328 | 1 | Morris Schechter | 0.15 |
| 328 | 2 | Queen's Palace Restaurant, Inc. | 0.36 |
| 328 | 3 | Max C. and Jason J. Lee | 0.07 |
| 328 | 4 | Jason J. Lee | 0.14 |
| 329 | 8 | 340 Hamilton Boulevard Associates | 0.42 |
| 329 | 9 | Anthony Pellegrino | 0.14 |
| 329 | 10 | Borough of South Plainfield | 0.11 |
| 329 | 11 | Anthony S., Jr. and Joann Zelek | 0.10 |
| 329.01 | 1 | Columbian Club/South Plainfield #6203, Inc. | 0.38 |

**Total Acreage (approx.) = 29.38**

Source: South Plainfield 2001 Tax Assessors Book and Tax Maps.




LEGEND

- RETAIL / COMMERCIAL
- MINI-STORAGE
- OFFICE / WAREHOUSE
- PUBLIC USE / STREET INTERSECTIO IMPROVEMENT
- SEMI-PUBLIC
- BUFFER / CONSERVATION
- ACCESS POINT
- PEDESTRIAN BRIDGE

GRAPHIC SCALE (in feet)

0 100 400 800
50 200

EXHIBIT 2

# HAMILTON BOULEVARD REDEVELOPMENT AREA

*THP, Inc.*
East Brunswick, New J

847590221

An additional lot identified for "public use/intersection improvement" is shown on the southerly side of New Market Avenue. This Plan designation is shown to facilitate roadway improvements in vicinity of the intersection. It is proposed that the balance of lot area for this parcel not used for roadway widening purposes be combined and developed for retail/commercial use.

Additional commercial development is shown on the Plan, located further away from Hamilton Boulevard adjacent to the proposed retail area. This portion of the overall redevelopment area is identified for "Mini-Storage" development. Primary access to this portion of the redevelopment area would be provided in the vicinity of the New Market Avenue intersection with Hamilton Boulevard. It is recommended that secondary access also be provided internally from the office/warehouse area located in the central portion of the redevelopment area.

The "Office/Warehouse" land use designation comprises the largest portion designated for development. Located in the central portion of the tract, primary access to this proposed development would be from Spicer Avenue, near Garibaldi Avenue. Secondary access for the office/warehouse development area is also shown from Spicer Avenue, near Fulton Street.

"Municipal Parking" is shown to be provided on the northerly portion of the site. This area would accommodate patron parking for the retail/commercial establishments within the redevelopment area as well as for nearby retail commercial businesses. Access to this municipal parking area would be provided from Hamilton Boulevard as shown on the Redevelopment Plan.

"Semi-public" use is shown on a small separate portion of the redevelopment area, adjacent to the Lehigh Valley Railroad right-of-way. This designation reflects an existing semi-public use located on the lot.

The remaining portions of the redevelopment area are shown for "Buffer/Conservation" area. The portion of land along Spicer Avenue is proposed for landscaped buffer to screen the mini-storage and office/warehouse portions of the redevelopment area from residential dwellings located on the opposite side of Spicer Avenue. A larger area proposed for conservation is located along the easterly and southerly portion of the redevelopment area. This designation reflects existing environmentally sensitive areas on Lot 1 of Block 256 which include an existing stream and associated floodplain area and wetlands areas.

A small area shown for conservation is shown to the north of the retail area, in vicinity of the municipal parking area. This designation is intended for open space area available for passive recreational use to the general public.

In addition to the Land Use Plan designations shown on the Redevelopment Plan, pedestrian access to the area is shown from the northerly side of the Lehigh Valley Railroad in vicinity of the proposed municipal parking area.

This bridge is intended to provide pedestrian access over the railroad to the existing Historic Downtown District located on the northerly side of the railroad corridor.

Intersection and roadway improvements associated with the redevelopment area are also proposed along Hamilton Boulevard and in particular, at the New Market Avenue intersection. Roadway improvements to Hamilton Boulevard include reconstruction of the roadway with the provision for separate turning lanes (northbound and southbound) at New Market Avenue and reconfiguration of the roadway in the vicinity of the Lakeview Avenue/Hamilton Boulevard intersection. Along with upgrade of the existing traffic signal at the Hamilton Boulevard/New Market Avenue intersection, roadway improvements include the reconstruction of the New Market Avenue approach to Hamilton Boulevard, with the provision for separate eastbound left-turn and right-turn lanes. Pedestrian sidewalk improvements are also proposed for Hamilton Boulevard and New Market Avenue.

## IMPLEMENTATION OF THE PLAN

The implementation of the "Redevelopment Plan" will require a cooperative effort between the Borough of South Plainfield, the developer(s) of the subject lands and all interested parties including current property owners, the business community and public at large. Cohesive and architecturally compatible redevelopment must be provided while still meeting the needs of the community and effectuating the goals and objectives of the Redevelopment Plan noted previously. Most importantly, the Redevelopment Plan must effectuate the goals and objectives of the Borough Master Plan and Development Ordinances.

Specific zoning amendments are not yet proposed to implement the "Redevelopment Plan". It is suggested that these detailed ordinance provisions be

crafted after additional planning, engineering and architectural schemes are developed in consultation with prospective developers, following the general intent of the "Conceptual Design Plan" for the tract.

Pursuant to N.J.S.A. 40A:12A-7(a)(4), all parcels shown on Exhibit 1, "Study Area," and further identified on Table 1 may be acquired by negotiation or condemnation in accordance with N.J.S.A. 40A:12A-8(b) and (c). Any structures on such properties may be demolished and the assembled site developed in accordance with the provisions of this Redevelopment Plan. Lot consolidation to the extent practical and permissible, shall be a goal of this Redevelopment Plan. To the extent necessary, public easements shall be negotiated and effectuated between the Borough of South Plainfield and the redeveloper on any project.

Any displaced resident within the Redevelopment Area shall be offered . relocation assistance in accordance with applicable state law. Such relocation assistance shall be directed towards decent, sanitary, safe and affordable dwelling units within the local housing market, which are hereby acknowledged as existent.

This Redevelopment Plan is consistent with the goals and objectives of the Borough Master Plan, the New Jersey State Development and Redevelopment Plan and the Middlesex County Master Plan.

Financial incentives may be utilized by the Borough of South Plainfield to foster the redevelopment efforts outlined within this Redevelopment Plan. Such incentives may include the use of short and long term tax incentives. The Borough may also be eligible for grant funds for public improvements necessary to facilitate a redevelopment project, and it shall take a proactive approach to securing such funds.

The Borough of South Plainfield may select or approve of a redeveloper to undertake a redevelopment project in furtherance of this Redevelopment Plan through various means. The Borough may prepare a Request for Qualifications (RFQ), to include, at a minimum: (1) a description of the redevelopment entity, disclosure of ownership interest, list of references, list of general or limited partners, financial profile of the redevelopment entity, and where applicable, a list of comparable projects successfully completed; (2) a description of the proposed use for the redevelopment projects, including analysis of the site, environmental

impact and assessments, and overall approach to site development; and (3) anticipated construction schedule. Upon receipt and consideration of applications submitted in response to a RFQ, the Borough may select and approve by Resolution among redeveloper(s), or it may reject all applications.

The Borough may also, at any time, entertain an unsolicited proposal from a prospective redeveloper. The Borough will have the option of conferring redeveloper status to such unsolicited redeveloper applicant upon consideration and approval by Resolution of the proposal, or it may put out a RFQ to solicit interest in the subject project from other potential developers.

The Borough is sensitive to the issues and desires of the present owners and thus such owners shall be given opportunity to participate in the redevelopment program. If, in any instance, the Borough chooses to issue a RFQ, the property owners within the designated redevelopment area shall be given notice of the issuance of such RFQ and be given an opportunity to offer a proposal in conformity with such RFQ.

The Borough of South Plainfield may designate a redevelopment entity as a Conditional Redeveloper for a particular project subject to the successful negotiation and execution of a redevelopment agreement with the Borough within twelve (12) months of conditional designation. An extension to this negotiation period may be granted in additional six (6) month increments, or the Borough may terminate the conditional redeveloper designation.

All approved redevelopers must enter into a written redeveloper agreement with the Borough of South Plainfield, pursuant and subject to N. J. SA. 40A: l2A-9.

**Streetscape**

Every consideration shall be given to improving the aesthetic appearance and curb appeal of the redevelopment area, including efforts to minimize excessive signage. Efforts shall also be made to maximize the use of shade trees and plantings, to the extent practical considering the environmental issues of the site.

Integration of canopies and awnings into the architectural design of redevelopment projects is encouraged, subject to the approval of the Borough. Business

identification through the use of lettering and/or logos on such canopies and awning will be permitted, provided it is part of the design and construction of the canopy or awning, and will not require a separate sign permit.

Additional signage standards shall apply throughout the redevelopment area, and no others signage will be permitted except as follows: (1) each business establishment with one or more independent entrances in a retail or office center will be entitled to one building sign to identify each entrance. The site plan submitted to the Planning Board must include building elevation drawings that incorporate locations designed into the building facades for identification signage that is part of the architectural context of the building. The size and graphics of the signage plan will be subject to approval of the Planning Board; (2) where a single building entrance is shared by two or more business establishments, a directory identification sign may be used to identify the name and location of each business, and such directory signs must be incorporated into the signage plan as described at (1) above; (3) storefront windows must be used for orderly display of merchandise and will not be permitted to become cluttered with temporary signage, flyers, leaflets, price advertisements or other material; (4) temporary sandwich board style signs will only be permitted for use in conjunction with a sidewalk café attached to a restaurant pursuant to an approved site plan by the Planning Board, and such signs may not exceed six square feet, must contain only the restaurant name and a menu, and must be removed when the outdoor café is not in use; (5) each new business establishment will be permitted one temporary banner announcing a grand opening for a period of three (3) calendar weeks from the first full or partial day it is open to the public, but such banner must not be larger than 5 percent of the façade area of the building occupied by the new business and must not be located anywhere other than on the front business façade.

Adequate and aesthetically attractive lighting throughout the redevelopment area shall be an integral component of this Redevelopment Plan, and efforts shall be made to incorporate such lighting into any redevelopment project undertaken within the area. To the extent practical, the transfer of utilities underground should be considered, and the costs of such transfer shall be allocated pursuant to N.J.S.A. 40A:12A-10.

847590233

# BOROUGH OF SOUTH PLAINFIELD

2480 Plainfield Avenue
South Plainfield, NJ 07080

AREA CODE 908
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Tax/Sewer - 226-7610

## ENVIRONMENTAL COMMISSION

July 11, 2003

Mr. Pete Mannino
Remedial Project Manager
U.S. EPA, Region II
290 Broadway, 19th Floor
New York, NJ 10007-1866

Re: Cornell-Dubilier Electronics Site
Proposed Plan

Dear Mr. Mannino:

The South Plainfield Environmental Commission has reviewed the cleanup alternatives for Operable Unit 1 that are outlined in the June 2003 document "Superfund Program Proposed Plan Cornell-Dubilier Electronics Site." The members have asked me to convey their comments to you.

The Commission supports Alternative 3: Excavation and Off-Site Disposal with Treatment. This alternative provides a permanent solution without need for on-going monitoring. It also avoids the complication of possible failure of institutional controls (e.g., future property owners' or tenants' ignorance of deed restrictions). Moreover, it appears to be ultimately less expensive than Alternative 2.

The Commission requests that you consider the following additional points:

1. New Jersey Department of Environmental Protection's residential cleanup standard of 0.49 ppm is lower than US EPA's standard of 1 ppm. This difference is causing some uneasiness and an adversarial atmosphere that is unnecessary and could delay action. The Commission recommends that EPA work with the State to resolve the standards conflict before work begins. The Commission would like to see the properties cleaned to the level of the NJDEP's standard, and hopes that a means to achieve this can be found.

2. Discovery of PCB contamination along the Borough's right of way suggests that contaminated dust has settled in the street. Spicer Avenue looks like a quiet, residential side street, but it is the main route to the Borough's solid waste and recycling facilities as well as to the ball fields. It is a heavily traveled road, and has

been for decades. Passing vehicles probably have moved contaminated dust along the roadway. The Commission believes that EPA should include testing the stormwater catch basins in its sampling program. If, over the years, contaminated dust has been continually blown off-site onto the roadway, then it has also been continually washed into the storm drains by rain. If there are significant PCB concentrations in the catch basins, they will serve as an ongoing source of PCB input to the Bound Brook. Although surface water will be addressed as part of OU3, the Commission believes that sampling the catch basins could be done now as part of OU1, since the catch basins are in the right of ways that will be resampled.

The Environmental Commission and I appreciate the opportunity to comment on this proposal. Please feel free to call on us if we can be of assistance in furthering the remediation of this site.

Yours truly,

Alice S. Tempel
Environmental Specialist

Cc: J. Vokral