



Community Environmental Advocate
662 Cedarbrook Road
Bridgewater, NJ 08807
908-526-1566

June 21, 2018

Mark Austin
Remedial Project Manager
U.S. Environmental Protection Agency, Region 2
290 Broadway, 19th Floor
New York, NY 10007-1866

Re: American Cyanamid Superfund Site
Bridgewater, New Jersey

Dear Mr. Austin:

CRISIS, Inc. appreciates this opportunity to comment on EPA's proposed plan for remediation of the OU 8 area of the American Cyanamid site – Impoundments 1 & 2.

As we expressed at the public meeting held in Bridgewater on June 12, we support EPA's recommended Alternative 6 for this portion of the site – known as ***“Excavation, Dewatering, Treatment/Destruction Off Site, Protective Cover”***. We favor this alternative because it best meets CRISIS' key principles for protecting the site, which we enumerated in our letter to you in October 2017 in advance of the National Remedy Review Board. These principles are:

- Complete Destruction of the Volatile Organic Compounds
- Protection of the Raritan River
- Ground Water Protection
- Preference for Long term Solutions
- A Final Destination for the Contaminants Outside of the Flood Plain and Off-Site

A copy of Ira Whitman's comments at the June 12 meeting are attached for the record.

As you know, CRISIS has had a long history as the EPA Technical Assistance Grant recipient for the American Cyanamid Site, and an even longer history as a responsible and effective Community Environmental Advocate. We have advocated for both the permanent and temporary ground water treatment plants at the Cyanamid site, as well as the HBW barrier walls and other measures that prevent contaminated ground water from entering into the Raritan River. We recently had the opportunity to tour the site and to observe the site-wide ground water collection and treatment system under construction. We will be excited and gratified when the facility construction is complete and fully operational.

We understand that the purpose of this letter is to comment on the selection of remediation methods for OU 8. However, because we are so familiar with the site and have had such a long history with it, we do wish to comment on a few aspects of the OU 4 remediation as the design is about to be completed and contractors selected for remediation of the site-wide soils and for many of the impoundments.

The presence of Impoundments 13, 17 & 24 in the flood plain has always been troubling to CRISIS. Due to their precarious location near the river, we urge you to consider removing all untreated waste material from those lagoons, not just the top 2 feet. We reiterate that soil caps for these lagoons, and others on the property will be highly vulnerable to floods, particularly at locations where high velocity flood waters can be anticipated. We believe all soil caps on the site should be hardened, and where necessary materials treated by In-Situ Solidification and Stabilization be anchored in place.

Additional measures with respect to OU 4 that we believe should be considered include:

- Periodic scheduled inspections of all soil caps, indefinitely
- All pumping equipment and emergency electrical power supplies should be raised on platforms to ensure protection during the occurrence of floods

CRISIS appreciates the valuable information provided by EPA during this long effort to remediate the site, and the open communication that you have had with our organization. We wish you success with getting the remediation for OU 4 fully functional and operational, and in implementing the selected remediation for OU 8 at the earliest possible date. The citizens of Bridgewater and surrounding communities deserve to see and to benefit from your actions, and as a community based organization we will continue to interact with EPA on their behalf.

Very truly yours,



Ross Stander
Executive Chairman



Ira L. Whitman, PhD, P.E.
Technical Advisor

RS/IW/kk
Attachment

cc: Melissa Dimas, USEPA
Mark Schmidt, USEPA
Haiyesh Shah, NJDEP

PRESENTATION AT EPA PUBLIC MEETING, JUNE 12, 2018, BRIDGEWATER, NJ

Good evening – my name is Ira Whitman. For the past 6 years I have been the Technical Advisor to CRISIS.

CRISIS is the EPA Technical Assistance grant recipient for the American Cyanamid site. It is an independent environmental community group that has served for many years as a watchdog for Bridgewater and Somerset County residents regarding this highly contaminated Superfund site. Ross Stander, the Executive Chairman of CRISIS will be speaking after me.

In the 50 years since I received my doctorate in Environmental Engineering Science I have been a researcher, a regulator, and a consultant, all in the field of Environmental Engineering. I am a Licensed Professional Engineer in New Jersey and 5 other states, and I am a New Jersey Licensed Site Remediation Professional.

For the 6 years I have been advising CRISIS I have reviewed technical reports on the Cyanamid site, written technical reports for CRISIS that are posted on our web site, toured the property several times to observe remediation activity, reviewed monthly progress reports from Wyeth Holdings/Pfizer and regularly participated in bi-monthly conference calls with USEPA, NJDEP, Bridgewater Township, Pfizer, and their consultants. Much of my attention was given to the most highly contaminated location on the property, Impoundments 1 & 2, which are in the flood plain, barely 700' from the Raritan River.

In October 2017 CRISIS was invited by EPA to submit its position on Impoundments 1 & 2 just before the meeting of the National Remediation Review Board which was about to review the alternatives for remediation. I co-wrote that letter with our Chairman, Ross Stander, with input from other members of the CRISIS Board. We set forth the criteria that we believed EPA's decision

should be based on, and applied those criteria to each of what we understood the alternatives were to be. The criteria we enumerated, which we labeled as Key Principles in the CRISIS analysis, were:

- Destruction of Volatile Organic Compounds
- Protection of the Raritan River
- Ground Water Protection
- Preference for Long Term Solutions
- Final Destination of Impoundment 1 & 2 Waste Material (which is by far the most toxic material on the entire site)

We stressed our concern for the following impacts:

- Public Health
- Safety
- Environmental
- Ecological

We then assessed each technology we believed was under consideration by EPA, and compared what we believed the feasible alternatives to be.

With all this considered, we stated in our letter to EPA **“CRISIS’ preferred remedial solution for Impoundments 1 & 2 is destruction of the waste at an off-site permitted cement kiln, facilitated by on-site mechanical dewatering”**. We are gratified by EPA’s selection of Alternative 6, which coincides with CRISIS’ analysis and our key principles.

With the public announcement of EPA’s decision, and the formal Record of Decision soon to follow, CRISIS’ work, and the following public concerns are not ending anytime soon.

Impoundments 1 & 2 are 400' from the nearest business and 1/3 mile from the nearest residence. Not too close – but close enough to be attentive to issues of safety, air quality and the high levels of toxicity of the chemicals in the impoundments. EPA will require the monitoring of vapors and air contaminants.

The River – Discharges to the Raritan have gone down with Pfizer's interim actions. They must continue to protect the river.

Floods – Floods will happen – the contractors cleaning up these impoundments must be nimble in how they anticipate and protect against floods, and after a flood must notify the public whether flood waters were exposed to the hazardous substances they are handling.

Rate of Progress - Superfund is by design a slow process, but the public has to keep pushing on EPA to get this completed. Before cleanup starts there will be additional reporting by Pfizer – and EPA review and approval; there will be design and approval steps that take time; there will be pre-construction steps and EPA review and approval; after all of those approvals removal of the wastes – to be transported off-site for treatment is estimated to take 3 years, and then the empty impoundments must be detoxified and filled in and closed. This will be slow – which is understood, as long as it is safe.

Truck Safety - There are likely to be 4 or 5 trucks a day, 4 days a week, 40 weeks a year, for 3 years. This is not an enormous volume of trucks – but truck safety should be paramount because these wastes are highly toxic and difficult! There should be coordination with local and state police, no trucks on local roads when school busses are operating, and super-trained drivers who are thoroughly OSHA and safety trained.

In short, we know that this is not the *easiest* alternative, and it is not the *least cost* alternative (far from it). But, with the right controls and vigilance CRISIS

believes it is the *safest* alternative, which is why we support it, because we believe it benefits Bridgewater, Bound Brook, Somerset County, and the state as the best long term, permanent solution to one difficult and nasty waste problem on the American Cyanamid site.

For questions or comments please contact Dr. Ira Whitman at iwhitman@whitmanco.com