



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

JAN 12 2017

Lisa Chiang, Spokesperson,
Ringwood C.A.R.E.S.
376 Skyline Lake Drive
Ringwood, NJ 07456

Robert Spiegel, Executive Director
Edison Wetlands Association
206 Tyler Road
Edison, NJ 08820

Jeff Tittel, Chapter Director
New Jersey Sierra Club
145 West Hanover Street
Trenton, NJ 08618

Dear Ms. Chiang, Mr. Spiegel and Mr. Tittel:

Thank you for your letter of December 19, 2016 concerning the U.S. Environmental Protection Agency's (EPA's) cleanup work at the Ringwood Mines/Landfill Superfund Site (Site), located in Ringwood, New Jersey.

In your letter you express concern as to whether the planned Operable Unit Two (OU2) cleanup activities in the Peters Mine Pit (PMP), Cannon Mine Pit (CMP), and O'Connor Disposal Areas (OCDA) can be conducted in a safe manner given the potential for subsidence issues related to historic mining activities at the Site.

Concerns regarding potential subsidence issues initially prompted EPA to require the performance of vibration monitoring studies in 2005 and 2006 in the vicinity of the PMP, CMP, and OCDA to ensure that paint sludge removal activities could be conducted in a manner which would not increase the risk of subsidence on nearby residential properties. The results of these studies indicated that cleanup work in these areas did not result in vibration levels at residential properties which could cause subsidence issues.

The potential for subsidence issues related to implementation of cleanup work in the PMP, CMP, and OCDA was evaluated once again during development of the design of the OU2 remedy. Existing site-specific geophysical investigations, as well as historic mining maps were reviewed as part of this evaluation. As noted in the August 7, 2015 Remedial Design Work Plan for OU2, no additional work was identified as being required to address mine-related subsidence issues.

You also request that EPA provide a comprehensive Health and Safety Plan (HASP) for the Site that reflects specific risks at the Site. Please note that it is EPA's policy to require the preparation of HASPs at all Superfund sites to ensure that cleanup efforts are conducted in a safe and protective manner. To that end, the Technical Specifications included in the September 2016 Draft Final Remedial Design Report for OU2 specifically require that the contractor that is selected to implement the OU2 remedial action prepare a HASP which establishes procedures to protect workers and the public from potential hazards posed by the work. EPA will make this HASP available to the public, once it is prepared.

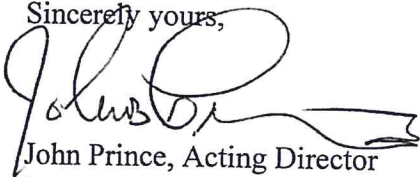
In your December 19, 2016 letter, you also request that EPA require the performance of a pilot project to demonstrate that the OU2 work can be conducted safely, prior to implementation of the full-scale cleanup. You indicate that this request is based upon procedures presented in EPA's *Abandoned Mine Site Characterization and Cleanup Handbook*. It should be noted that the referenced procedure identified in this guidance document is applicable to cleanup efforts to be conducted in residential yards, with the intent of alleviating residents' concerns regarding the disruptive nature of cleanup efforts on their property. Therefore, performance of a demonstration project is not warranted, as the OU2 remedy will be conducted solely on property owned by the Borough of Ringwood or the State of New Jersey. It should be noted, however, that the past performance of numerous paint sludge removal actions and residential property cleanup actions at the Site has demonstrated that cleanup work can be conducted in a safe manner.

You also request an explanation for the March 18, 2016 well drilling incident that occurred in the OCDA. As noted in EPA's April 8, 2016 Community Notice, during the drilling of a bedrock well in the OCDA, the driller encountered an approximately one-foot wide fracture in the bedrock. The lack of drilling resistance associated with the fracture resulted in the drill head dropping approximately one foot before hitting bedrock again. Ground subsidence was not observed during this event. Geologists with EPA and the New Jersey Department of Environmental Protection have reviewed the drill logs for this well and believe that a naturally occurring bedrock fracture was encountered at this location.

As you are aware, EPA also supports reformation of the Ringwood Community Advisory Group (CAG) and procurement of a technical advisor to assist the CAG in reviewing technical documents. As discussed during our December 6, 2016 meeting, EPA is currently working through its Technical Assistance Services for Communities (TASC) program to procure an independent consultant to provide technical assistance to the reformed CAG. EPA will continue to work with the community to reform a CAG which is representative of the impacted community.

I want you to know that my colleagues and I are committed to ensuring that the cleanup work at the Site is conducted in a manner that is safe for nearby residents as well as site workers. If you have additional concerns regarding the Site, please feel free to contact Joseph Gowers, of my staff, at (212) 637-4413.

Sincerely yours,

A handwritten signature in black ink, appearing to read "John Prince". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

John Prince, Acting Director
Emergency & Remedial Response Division