



# BOROUGH OF RINGWOOD

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## VIA ELECTRONIC AND REGULAR MAIL

April 5, 2016

Walter Mugdan, Director Emergency and Remedial Response Division  
United States Environmental Protection Agency  
290 Broadway  
New York, NY 10007-1866

Dear Mr. Mugdan:

The Borough requests a meeting with you and EPA at your earliest convenience to discuss:

1. The failure of the EPA to analyze for 1,4 dioxane whenever EPA took split samples with Ford during the groundwater remedial investigation work at the Ringwood Mines/landfill Superfund Site over the past several years.

At the Borough's request, Joe Gowers reviewed the EPA's split sample results for the past several years and advised the Borough that the EPA laboratory did not analyze for 1,4 dioxane. It is disturbing that the EPA's own laboratory did not analyze for 1,4 dioxane when EPA apparently modified the list of compounds that laboratories were to analyze for under CERCLA in August 2007 to add 1,4 dioxane. It is the Borough's understanding that most commercial laboratories were doing so in 2008 or, at the latest, in 2009. EPA also failed to require Ford to add 1,4 dioxane to the list of compounds it was to analyze for under CERCLA as early as August 2007 as well.

Analysis for 1,4 dioxane at the Ringwood Site had not been conducted (and, therefore, not reported) until the Borough took the initiative to take split samples of targeted groundwater monitoring wells in and around the Peter's Mine Pit Area, and used a different laboratory than Ford and EPA. It was only through the Borough's actions that 1,4 dioxane was reported at the Site.

2. It is imperative that the EPA ensure that the public is provided with complete and accurate information, data and knowledge about the environmental conditions of the Site so that the public is not misled. It is the EPA's responsibility to do so, including the correction of misinformation or inaccurate statements made in the public forum, whether during a CAG meeting or in the press.

Some of Ringwood's residents continue to wrongly believe that the Borough's drinking water is contaminated with 1,4 dioxane despite the fact that the past and current testing of the sources of the Borough's drinking water show that it is safe to use and is not contaminated. The 1,4 dioxane exceedances reported at the Site are in the groundwater and a limited number of surface water samples largely within the boundaries of the Ringwood State Park property owned by the State of New Jersey. We urge EPA to share all such data, past and future, with the public as soon as it becomes available.

3. Whether the Contingency Remedy selected by EPA for the O'Connor Disposal Area remains protective of human health and the environment.

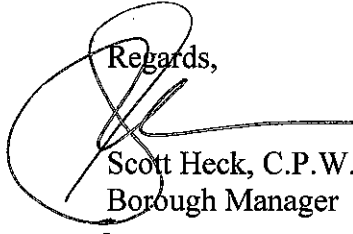
To date, the 1,4 dioxane exceedances reported in groundwater and a limited number of surface water locations have not shown any relationship to the OCDA. The Borough will continue to develop (including any necessary revisions to) its technical positions based in part on the Agencies' expert opinions, on the data as evaluated by the Borough's independent environmental professionals, and the overall best interests of the residents, including the future proposed use of its property. As the Borough has always done, we will continue to participate in on going environmental investigation of the Site by providing input into the draft remedial investigation workplans, evaluation of resulting data and development of conclusions which may be made about the environmental condition of the Site.

Since the Borough is aware that new data will still be generated over the next several months, including from new bedrock and overburden wells recently installed by Ford (most notably one in the OCDA) and an additional set of surface water samples collected in and downstream of the Park Brook, we will continue to review and evaluate all new data. The Borough agrees with EPA that further investigation of the groundwater and surface waters at the Site for 1,4 dioxane is warranted to gain a more complete understanding before any additional remedial decisions for the Site are made. The Borough remains committed to supporting remedies which are selected based on valid and reliable scientific data and evidence and are protective of human health and the environment and we urge the EPA to do the same.

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Thank you for your consideration of the Borough's concerns and please propose a few dates and times for our meeting.

Regards,



Scott Heck, C.P.W.M.  
Borough Manager

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