SECOND FIVE-YEAR REVIEW REPORT CORNELL-DUBILIER ELECTRONICS SUPERFUND SITE SOUTH PLAINFIELD, MIDDLESEX COUNTY, NEW JERSEY



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LIST OF ABBREVIATIONS & ACRONYMS

ACO Administrative Consent Order

ARARs Applicable or Relevant and Appropriate Requirements

CDE Cornell-Dubilier Electronics

CERCLA Comprehensive Environmental Response, Compensation and Liability Act

COC Contaminant of Concern

EPA United States Environmental Protection Agency

FS Feasibility Study ICs Institutional Controls

NJDEP New Jersey Department of Environmental Protection

NPL National Priorities list O&M Operation & Maintenance

OU Operable Unit
OU1 Operable Unit One
OU2 Operable Unit Two
OU3 Operable Unit Three
OU4 Operable Unit Four
PCE Tetrachloroethylene
ppm Parts Per Million

PRP Potentially Responsible Party

RA Remedial Action

RAO Remedial Action Objective

RD Remedial Design

RD/RA Remedial Design/Remedial Action

RI Remedial Investigation ROD Record of Decision TCE Trichloroethylene

USACE United States Army Corps of Engineers

VOCs Volatile Organic Compounds

I. INTRODUCTION

The purpose of a five-year review (FYR) is to evaluate the implementation and performance of remedies in order to determine if the remedies are and will continue to be protective of human health and the environment. The methods, findings, and conclusions of reviews are documented in FYR reports such as this one. In addition, FYR reports identify issues found during the review, if any, and identify recommendations to address them.

The U.S. Environmental Protection Agency (EPA) is preparing this FYR review pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 121, consistent with the National Contingency Plan (NCP)(40 CFR Section 300.430(f)(4)(ii)), and considering EPA policy.

This is the second FYR for the Cornell-Dubilier Electronic Superfund (CDE) site. The triggering action for this statutory review is the signing date of the previous five-year review report, November 28, 2011. A FYR has been prepared due to the fact that hazardous substances, pollutants or contaminants remain at the site above levels that allow for unlimited use and unrestricted exposure (UU/UE).

The Site consists of four Operable Units (OUs), three of which will be addressed in this FYR. Operable Unit 1 (OU1) addresses properties in the vicinity of the former CDE facility; Operable Unit 2 (OU2) refers to the remediation of the 25-acre former CDE facility; Operable Unit 3 (OU3) focuses on the contaminated groundwater and Operable Unit (OU4) addresses the contaminated sediments in the Bound Brook. Protectiveness statements are not included in this FYR for OU4 since it is in the remedial design phase.

The Cornell-Dubilier Electronics Superfund site FYR was led by Diego Garcia, the Environmental Protection Agency (EPA) Remedial Project Manager (RPM). Participants included Rich Puvogel (Central New Jersey Remediation Section Chief), Chloe Metz (Risk Assessor), and Diana Cutt (Hydrogeologist) of EPA. The potentially responsible party (PRP) and owner of the former CDE facility property, D.S.C of Newark Enterprises, was notified of the initiation of the FYR. The FYR began October 2016.

Site Background

The Cornell-Dubilier Electronics site is located at 333 Hamilton Boulevard, South Plainfield, Middlesex County, New Jersey (See figure 1). The former CDE facility, now known as the Hamilton Industrial Park, consists of approximately 26 acres which contained 18 buildings that were used by a variety of commercial and industrial tenants. The fenced 26-acre facility is bounded on the northeast by the Bound Brook and the former Lehigh Valley Railroad, Perth Amboy Branch (now 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 to the northwest, across Hamilton Boulevard, by mixed residential and commercial properties.

Based on the characteristic surface features of the facility property, the site can be subdivided into two major areas. The northwestern portion of the Hamilton Industrial Park was largely paved and contained 18 buildings constructed of wood frame or brick that were used by a variety of commercial and industrial tenants. These buildings were removed during the OU2 remedial action. The southeast area of the property is primarily an open field, with some wooded areas. The property drops steeply to the

southeast, and the eastern portion of the property consists of wetlands bordering the Bound Brook.

The Hamilton Industrial Park is zoned for commercial/industrial use. Based upon discussions with the Borough of South Plainfield, EPA does not expect the zoning of this property to change in the near future. In December 200l, 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 and on July 15, 2002, the Borough of South Plainfield approved the redevelopment plan. The redevelopment plan does not require re-zoning of the industrial park.

FIVE-YEAR REVIEW SUMMARY FORM

SITE IDENTIFICATION				
Site Name: Cornel	l-Dubilier Electro	nics Superfund Site		
EPA ID: NJD98	1557879			
Region: 2	State: NJ	City/County: South Plainfield, Middlesex County		
	S	SITE STATUS		
NPL Status: Final				
Multiple OUs? Yes	Has t No	the site achieved construction completion?		
	RE	EVIEW STATUS		
Lead agency: EPA [If "Other Federal Agency", enter Agency name]:				
Author name (Federal or State Project Manager): Diego Garcia				
Author affiliation: EPA				
Review period: 11/28/2011 - 11/28/2016				
Date of site inspection: 9/28/2016				
Type of review: Statutory				
Review number: 2				
Triggering action date: 11/28/2011				
Due date (five years after triggering action date): 11/28/2016				

II. RESPONSE ACTION SUMMARY

Basis for Taking Action

PCBs are considered the only contaminant of concern at OU1 properties. At these properties, PCB-contaminated indoor dust appeared to be attributable to soils that migrated indoors.

For OU2, exposures to soil and indoor dust through ingestion, inhalation and dermal contact with these media were found to be associated with significant human health risks for site workers, trespassers and construction workers. The majority of the cancer risks and noncancer hazards were associated with exposure to high concentrations of PCBs.

Exposure to contaminated groundwater by residents, site workers and construction workers was evaluated as part of the OU3 remedy. Cancer risk and noncancer hazard in exceedance of regulatory thresholds was primarily attributable to ingestion of groundwater contaminated with TCE and cis-1,2 dichlorothylene, respectively. PCBs in groundwater also contributed to cancer risk and noncancer hazard in groundwater found in the footprint of the former CDE facility.

Ecological risk assessments were performed as part of the OU4 work on the off-site properties as well as the CDE facility area. Excess risks were found only on the undeveloped portion of the industrial park, based on possible ecological receptors and a supportive habitat.

Remedial actions to address ecological concerns in the Bound Brook will be addressed as part of the OU4 work.

Response Actions

In 1996, NJDEP conducted a site inspection and collected surface soil, surface water, and sediment samples at the CDE facility property. In June 1996, at the request of NJDEP, EPA collected and analyzed additional soil, surface water and sediments at the former CDE facility. The results of the sample analyses revealed that elevated levels of PCBs, VOCs, and inorganics were present at the CDE site.

As a result of the contamination found at the facility, in March 1997, EPA ordered the PRP and owner of the former CDE facility property, D.S.C of Newark Enterprises, 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 July 1998, EPA included the CDE site on the National Priorities List (NPL).

Remedial Action Objectives and Selected Remedies

The Remedial Action Objectives (RAOs) and selected remedies for OUs reviewed are described below:

OU1-The OU1 ROD was issued in September 2003. The RAOs for this remedy are to:

- 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.

The major components of the OU1 selected remedy include:

- Excavation of an estimated 2,100 cubic yards of contaminated soil which exceed the remediation goal of 1 part per million (1 ppm) of PCBs, 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 exceeding the remediation goal of 1 ppm of PCBs; and
- Where necessary, temporary relocation of residents during the indoor remediation.

OU2 -The September 2004 ROD for OU2 identified the following RAOs for contaminated soils and buildings at the former CDE facility:

- Reduce or eliminate exposure to contaminated soils and building material to levels that are protective of commercial or industrial use, and protective of the environment;
- Prevent/minimize migration of contamination to the Bound Brook from surface soils; and
- Reduce or eliminate the migration of site contaminants from soil and debris to the groundwater.

The major components of the selected OU2 remedy included:

Soils

- Excavation of an estimated 107,000 cubic yards of contaminated soil containing PCBs at concentrations greater than 500 ppm and contaminated soils that exceed New Jersey's Impact to Groundwater Soil Cleanup Criteria for contaminants other than PCBs;
- On-site treatment of excavated soil amenable to treatment by low temperature thermal desorption (LTTD), followed by backfilling of excavated areas with treated soils;
- Transportation of contaminated soil and debris not suitable for on-site LTTD treatment to an offsite facility for disposal, with treatment as necessary;
- Excavation of an estimated 7,500 cubic yards of contaminated soil and debris from the capacitor disposal areas and transportation for off-site disposal, with treatment as necessary;
- Installation of a multi-layer cap or hardscape;
- Installation of engineering controls;
- Property restoration; and
- Implementation of institutional controls.

Buildings

- Demolition of the 18 on-site buildings to address PCB and inorganic contamination in the buildings interiors;
- Transportation of the building debris off-site for disposal, with treatment as necessary; and
- Relocation of eligible tenants at the former CDE facility buildings pursuant to the Uniform Relocation Act, as necessary.

OU3 -The September 2012 ROD for OU3 identified the following RAOs for contaminated groundwater at the site:

- Prevent or minimize potential risks to human receptors from exposure by contact, ingestion, or inhalation/vapor intrusion of contaminants in groundwater attributable to the site; and
- Prevent further migration of site contaminants in groundwater at levels posing an unacceptable risk to human health beyond the areal extent of the proposed technical impracticability (TI) zone.

The major comments of the OU3 remedy included:

- Prevention of exposure to site groundwater contamination, by continuing efforts to identify existing private wells within the OU3 study area, and by placing institutional controls in the form of a Classification Exception Area (CEA) to restrict the installation of new drinking water wells;
- Implementation of a long-term sampling and analysis program to monitor the groundwater contamination at the site, in order to prevent exposure and assess groundwater migration; and
- Implementation of a long-term vapor intrusion monitoring program.

EPA evaluated alternatives for restoration of groundwater to meet Applicable or Relevant and Appropriate Requirements (ARARs) and concluded that no practicable alternatives could be implemented. Consequently, EPA invoked an ARAR waiver for the groundwater at the site in the OU3 study area (see figure 2) due to technical impracticability (TI). Site-specific factors such as the long history of releases, the presence of Dense Non-Aqueous Phase Liquid (DNAPL) and the widespread presence of Chlorinated Volatile Organic Compound (CVOCs) in the bedrock groundwater, and the complex geology of the site were the rationale for the impracticability of groundwater restoration. The OU4 ROD expanded the TI wavier determination to cover the remaining groundwater that discharges to the Bound Brook within the OU3 study area.

Status of Implementation

OU1- In September 2003, EPA selected an OU1 remedy addressing PCB-contaminated soils and interior dust at properties in the vicinity of the former CDE facility. The remedy required the excavation, offsite transportation, and disposal of PCB-contaminated soils, along with property restoration. The OU1 remedy also called for interior dust cleaning at properties where PCBs were detected indoors. EPA began remediating the first group of OU1 properties in 2005; remediation work was completed in 2014. As of February 2014, over 135 properties have been sampled as part of the OU1 remedy (including properties sampled during earlier phases of investigation), leading to remedial actions at 34 properties. The remedial action reports documenting completion of this work were signed in 2009 and 2014. Contaminant concentrations remain below levels that allow for UU/UE at all OU1 properties and future FYRs will not evaluate OU1.

OU2 - The work for OU2 began with the relocation of tenants, followed by the demolition of the former CDE facility structures, and the excavation of soils from a capacitor disposal area. In 2009, soil remediation commenced, which included: excavating, treating and/or disposing of contaminated soil from the former CDE facility. Approximately 220,000 tons of contaminated soil were excavated, with 98,000 tons treated by the on-site LTTD and placed back on-site, with the remaining soils disposed of off site. Site restoration and paving activities, such as installing a multi-layered asphalt cap and construction of a storm water conveyance system and detention basin followed and were completed in September 2015. The results for these remediation activities are reported in the August 2009, August

2010, and July 2014 Remedial Action Reports. In addition, a deed notice will be placed on the site once all the remedial work for the soils on the former CDE facility property is complete. It will include giving notice of the contaminants that remain, engineering controls (the cap and the vapor barrier), restrictions on use, alterations, improvements and disturbances, and monitoring and maintenance upon property redevelopment or transfer.

OU3 – Before the signature of the ROD in September 2012, EPA conducted vapor intrusion studies at a number of properties (see figure 3) in South Plainfield. EPA targeted residential properties between the former CDE facility and Spring Lake, where shallow groundwater contamination posed a plausible concern for vapor intrusion occurring. EPA also targeted a number of properties in the core OU1 study area, just south of the former CDE facility, as a precaution. These studies indicated that vapor intrusion exposure is not a current pathway of concern at the site. Since 2007, during five sampling events, EPA tested 52 properties and all but two showed no evidence of vapors in the subsurface. Although elevated vapor levels were detected under the basement slab at two properties, one was in an area not affected by site groundwater contamination, and at the other, only PCE was detected, indicating the possible contamination is not site related. These locations have since been referred to NJDEP for further evaluation.

IC Summary Table

Table 1: Summary of Planned and/or Implemented ICs

Media, engineered controls, and areas that do not support UU/UE based on current conditions	ICs Needed	ICs Called for in the Decision Documents	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date (or planned)
A deed notice for the continued use of the former CDE facility property as non-residential (commercial/light industrial), identified in in the OU2 ROD, has yet to be implemented and is under development.	Yes	Yes	Former CDE facility property	Prohibits any residential development at the former CDE facility property.	9/30/22
Classification Exemption Area (OU3)	Yes	Yes	Impacted groundwater (TI zone)	Restricts the installation of drinking water wells	9/30/18

Systems Operations/Operation & Maintenance

In August 2015, the PRP and owner of the former CDE facility property, D.S.C of Newark Enterprises, was notifed of their responsibility for maintaining the asphalt cap and storm water retention basin. More specific information about there continuing obligations are set out in more detail in the consent decree, United States v. D.S.C. of Newark Enterprises, Inc., No. 2:14-cv-05734 (Consent Decree).

In addition, when the necessary deed notice has been recorded for the former CDE facility property, it will include giving notice of the contaminants that remain, engineering controls (the cap and the vapor

barrier), restrictions on use, alterations, improvements and disturbances, and monitoring and maintenance upon property redevelopment or transfer.

Groundwater sampling to determine sampling parameters and monitoring wells that will be used for the long term monitoring program is scheduled for completion September 2017. Vapor intrusion sampling will be evaluated by EPA every five years to ensure that conditions have not changed.

Potential site impacts from climate change have been assessed, and the performance of the remedy is currently not at risk due to the expected effects of climate change in the region and near the site.

III. PROGRESS SINCE THE LAST REVIEW

This section includes the protectiveness determinations and statements from the **last** FYR as well as the recommendations from the **last** FYR and the current status of those recommendations.

Table 2: Protectiveness Determinations/Statements from the 2011 FYR

OU#	Protectiveness Determination	Protectiveness Statement
1	Will be Protective	The remedy at OU1 is expected to be protective of human health and the environment upon completion, and in the
		interim, exposure pathways that could results in unacceptable risks are being controlled.
2	Will be Protective	The remedy at OU2 is expected to be protective of human health and the environment upon completion, and in the interim, exposure pathways that could results in unacceptable risks are being controlled.

Table 3: Status of Recommendations from the 2011 FYR

OU #	Issue	Recommendations	Current Status	Current Implementation Status Description	Completion Date (if applicable)
2	A deed notice for continued use of the former CDE facility property as non-residential (commercial/light Industrial), Identified in the OU2 ROD, has yet to be implemented and is under development.	A deed notice should be placed on the site.	Ongoing	A deed notice will be placed on the site once all the remedial work for the soils on the former CDE facility property is complete.	9/30/2022

Since the last FYR was completed in 2011, as was referenced in the previous section, the following activities have been completed:

- 1. The OU1 remedial action was completed in August 2014 and allows for unlimited use of the remediated properties.
- 2. The OU2 remedial action was completed in July 2014 and operation and maintenance activities of the asphalt cap and storm water retention basin have been transferred to D.S.C. of Newark Enterprises. EPA is working to get the deed restriction in place.
- 3. The OU3 remedy was selected invoking a TI waiver for groundwater study area as well as the requirement for institutional controls, and vapor intrusion and groundwater monitoring. Groundwater sampling to determine sampling parameters and monitoring wells that will be used for the long term monitoring program is scheduled for completion September 2017.
- 4. The OU4 ROD was signed May 2015 and is currently under design. These activities will be reviewed as part of the next FYR.

IV. FIVE-YEAR REVIEW PROCESS

Community Notification, Involvement & Site Interviews

On November 14, 2016, EPA Region 2 posted a notice on its website indicating that it would be reviewing site cleanups and remedies at 38 Superfund sites in New York and New Jersey, including the CDE site. The announcement can be found at the following web address: https://www.epa.gov/sites/production/files/2016-11/documents/five_year_reviews_fy2017_final.pdf.

In addition to this notification, a public notice was provided to the Borough of South Plainfield on January 13, 2017 with a request that the notice be posted in the respective municipal offices and in the South Plainfield Public Library web site. The purpose of the public notice was to inform the community that the EPA would be conducting the second five-year review to ensure that the remedy implemented at the site remains protective of public health and is functioning as designed. In addition, the notice included the RPM and the CIC address and telephone numbers. The EPA RPM was not called by any members of the community regarding this five-year review.

EPA has made all site-related documents available to the public in the administrative record repositories maintained at the EPA Region 2 office (290 Broadway, New York, New York 10007), and South Plainfield Public Library, 2484 Plainfield Avenue, South Plainfield, New Jersey.

Data Review

The long term groundwater monitoring program began in December 2016. Groundwater samples are being collected from 38 monitoring wells and analyzed for VOCs, PCBs in representative wells, general water quality parameters, and natural attenuation parameters. Monitoring will also include coordinating with the private water company that services the area, and assessing changes in pumping or influent water quality to the drinking water systems. No groundwater data has been collected since the ROD.

Regular vapor instrusion monitoring occurs as part of the OU3 remedy. Over the course of several years, EPA has tested 52 properties, as discussed in the previous section, but none have shown to be impacted by site-related contamination above levels of concern. Vapor intrusion sampling last occurred in 2014 and will be evaluated every five years to confirm that conditions have not changed.

Site Inspection

The inspection of the CDE site was conducted on September 28, 2016. The following parties were in attendance: Diego Garcia, EPA Region 2 RPM; Patrick Nejand, Army Corps of Engineers. The purpose of the inspection was to assess the protectiveness of the remedy.

The OU2 site inspection consisted of an inspection of the entire former CDE facility property, and included security fencing, on-site drainage and capping systems and, surrounding off-site areas.

The following sections present the results of the OU2 site inspection, separated into each inspected element.

Security Fencing - Upon inspection, the site fencing for the former CDE facility was undamaged and in working order. The owner of the property repairs any damage to the property upon discovery.

Surrounding Areas - Nothing out of the ordinary was noted. No areas of runoff from the site appear to have impacted off-site areas. No new construction on neighboring properties or other factors that might change exposure scenarios were identified.

Capping and On-site Drainage System -The drainage system and asphalt cap are working as intended.

V. TECHNICAL ASSESSMENT

QUESTION A: Is the remedy functioning as intended by the decision documents?

The OU1 remedy consisted of the temporary relocation, where appropriate, excavation and off-site disposal of PCB contaminated soils above remediation goal of 1 ppm, remediation of indoor dust above the same 1 ppm remediation goal, and property restoration. Post-remediation sampling shows these goals were met and that the OU1 remedy achieved contaminant levels that allow for unrestricted use and unlimited exposure. This will be the final FYR for this OU.

The OU2 remedy consisted of excavation for off-site disposal of the capacitor debris area; excavation of soil containing PCBs at concentrations over 500 ppm and contaminated soils that exceeded New Jersey's Impact to Groundwater Soil Cleanup Criteria for non-PCB contaminants; on-site treatment of excavated soils with LTTD and backfilling of treated soil; installation of a asphalt cap and storm water retention basin; engineering controls; and implementation of institutional controls. Post-remediation sampling shows these goals were met, the asphalt cap and storm water retention basin are in place and security fencing surrounds the site. The deed restriction is in development.

The OU3 remedy includes a long-term groundwater monitoring program and sampling to confirm the plume is stable. The long term groundwater monitoring began in December 2016. It is anticipated that groundwater samples will be collected from 38 monitoring wells and analyzed for VOCs and PCBs in

representative wells, general water quality parameters, and natural attenuation parameters. Monitoring will also include coordinating with a private water company and assessing changes in pumping or influent water quality to the drinking water systems. Vapor intrusion sampling will be evaluated every five years to confirm that conditions have not changed. Additionally, institutional controls limiting or restricting private drinking water wells within the area of contamination will ensure that this pathway are in development.

QUESTION B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives (RAOs) used at the time of the remedy selection still valid?

There have been no physical changes to the CDE site that would adversely affect the protectiveness of the remedy. Land use assumptions, exposure assumptions and pathways, cleanup levels and remedial action objectives considered in the decision documents remain valid. The former CDE facility property is zoned for commercial/industrial use, and is expected to remain so.

For OU1, the contaminant of concern (COC) was PCBs, and a cleanup level of 1 ppm for soil and dust was selected based on EPA's "Guidance on Remedial Actions at Superfund Sites with PCB Contamination." Because this cleanup level is within the target risk range and below the noncancer threshold, it remains valid. The Remedial Action Reports for OU1 indicate that this cleanup level was achieved in all residential properties.

By removing and treating the facility soils, and covering them with an asphalt cap, exposure to onsite soils has been removed. Although the deed restriction is not in place, the site is fenced and access is controlled.

Although the CEA is not in place yet, there are no private drinking water wells in the vicinity of the TI zone. Therefore, no exposure pathway exists. The vapor intrusion pathway has been thoroughly investigated at the properties near the former CDE facility. No properties have been found to have subslab levels of site-related contaminants that exceed health-based screening levels. Sampling of a representative number of buildings every five years will be evaluated until the groundwater monitoring program is fully implemented and VOC trends are established.

Ecological risk assessments were performed on the off-site properties as well as the former CDE facility area. Excess risks were found only on the undeveloped portion of the industrial park, based on possible ecological receptors and a supportive habitat. Further ecological investigation will be conducted as part of the Bound Brook OU4.

QUESTION C: Has any **other** information come to light that could call into question the protectiveness of the remedy?

No.

VI. ISSUES/RECOMMENDATIONS

Issues and Recommendations Identified in the Five-Year Review:

OU (s): 2	Issue Category: Institutional Controls			
	Issue: A deed notice for continued use of the former CDE facility property as non-residential (commercial/light Industrial), identified in the OU2 ROD, has yet to be implemented.			
	Recommendation: Place deed notice on former CDE facility property.			
Affect Current Protectiveness	Affect Future Party Oversight Milestone Date Protectiveness Responsible Party			
No	Yes	PRP	EPA	9/30/2022

OU (s): 3	Issue Category: Institutional Controls			
	Issue: A CEA for OU3 needs to be established.			
	Recommendation: Put the CEA in place.			
Affect Current Protectiveness	Affect Future Party Oversight Milestone Date Protectiveness Responsible Party			
No	Yes	EPA	EPA	9/30/2018

VII. PROTECTIVNESS STATEMENT

Protectiveness Statement(s)					
Operable Unit: OU1	Protectiveness Determination: Protective	Planned Addendum Completion Date:			
Protectiveness Statemenvironment.	nent: The remedy at OU1 is protective of h	uman health and the			

	Protectiveness Statement(s)	
Operable Unit: OU2	Protectiveness Determination: Short-term Protective	Planned Addendum Completion Date: 9/30/2022

Protectiveness Statement: The remedy at OU2 is protective of human health and the environment in the short term because the fence around the site prevents trespassers and the site is capped preventing direct exposure to contamination. In order to be protective in the long-term, a deed restriction needs to be placed on the former CDE facility property.

	Protectiveness Statement(s)	
<i>Operable Unit:</i> OU3	Protectiveness Determination: Will be Protective	Planned Addendum Completion Date: 9/30/2018
Protectiveness Staten	nent: The remedy at OU3 is expected to be	protective of human health

Protectiveness Statement: The remedy at OU3 is expected to be protective of human health and the environment upon completion. In the interim, remedial activities completed to date have adequately addressed all exposure pathways that could result in unacceptable risks.

VIII. NEXT REVIEW

The next five-year review for the Cornell-Dubilier Electronics Superfund site is required five years from the completion date of this review.





