FIVE-YEAR REVIEW REPORT

ASBESTOS DUMP SUPERFUND SITE
(Operable Unit One and Operable Unit Two)

MILLINGTON, LONG HILL TOWNSHIP, MORRIS COUNTY, NEW JERSEY

Prepared By:
U.S. Environmental Protection Agency
Region II
New York, New York

SEPTEMBER 2005
Executive Summary

The Asbestos Dump Superfund Site (Site) was addressed in three operable units (OUs). The first operable unit (OU-1), the Millington parcel, is a property located in Millington, NJ. The second operable unit (OU-2) covers the New Vernon Road and White Bridge Road properties, which are located in Meyersville, NJ. The third operable unit (OU-3) covers the Dietzman Tract, which is located in the Great Swamp National Wildlife Refuge in Harding Township, NJ and is under Federal Facilities jurisdiction. This Five Year Review covers only OU-1 and OU-2.

OU-3 is under Federal Facilities jurisdiction. A Five Year Review for OU-3 is being prepared by the US Department of Interior/Fish and Wildlife Service as a separate report.

The implemented remedies for OU-1 and OU-2 of the Asbestos Dump Superfund Site protect human health and the environment. There are no exposure pathways that could result in unacceptable risks and none expected as long as the engineered, access and institutional controls are properly monitored and maintained and the site uses remain consistent with the remedies.
## Five-Year Review Summary Form

### SITE IDENTIFICATION

<table>
<thead>
<tr>
<th>Site name (from WasteLAN):</th>
<th>Asbestos Dump</th>
</tr>
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<tbody>
<tr>
<td>EPA ID (from WasteLAN):</td>
<td>NJD980654149</td>
</tr>
<tr>
<td>Region: 2</td>
<td>State: NJ</td>
</tr>
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<td>City/County: Millington, Morris County</td>
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### SITE STATUS

<table>
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<tr>
<th>NPL status:</th>
<th>Final</th>
<th>Deleted</th>
<th>Other (specify) Partial deletion(OU-2 WBR deleted in 2002)</th>
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<tbody>
<tr>
<td>Remediation status (choose all that apply):</td>
<td>Under Construction</td>
<td>Constructed</td>
<td>Operating</td>
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<tr>
<th>Multiple OUs?:</th>
<th>YES</th>
<th>NO</th>
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<tr>
<td>Construction completion date:</td>
<td>06/30/00</td>
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</table>

| Has site been put into reuse? | YES | NO | N/A |

### REVIEW STATUS

<table>
<thead>
<tr>
<th>Lead agency:</th>
<th>EPA</th>
<th>State</th>
<th>Tribe</th>
<th>Other Federal Agency</th>
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</thead>
<tbody>
<tr>
<td>Author name:</td>
<td>Mary Anne Rosa</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Author title:</td>
<td>Remedial Project Manager</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Author affiliation:</td>
<td>EPA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Review period:**</td>
<td>9/2000 to 9/2005</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Date(s) of site inspection:</td>
<td>May 23, 2005</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Type of review:</td>
<td>Post-SARA</td>
<td>Pre-SARA</td>
<td>NPL-Removal only</td>
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<tr>
<td>Review number:</td>
<td>1 (first)</td>
<td>2 (second)</td>
<td>3 (third)</td>
<td>Other (specify)</td>
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<table>
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<tr>
<th>Triggering action:</th>
<th>Actual RA Onsite Construction at OU #1</th>
<th>Actual RA Start at OU# 1</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>Construction Completion</td>
<td>Previous Five-Year Review Report</td>
</tr>
<tr>
<td></td>
<td>Other (specify)</td>
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</tr>
</tbody>
</table>

| Triggering action date (from WasteLAN): | 9/27/2000 |

| Does the report include recommendation(s) and follow-up action(s)? | yes | no |

| Is the remedy protective of the environment? | yes | no |

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* [“OU” refers to operable unit.]

** [Review period should correspond to the actual start and end dates of the Five-Year Review in WasteLAN.]
Remedy Assessment Summary

According to the data reviewed and the site inspection, the OU-1 and OU-2 remedies are functioning as intended by the RODs. The landfill caps prevent direct exposure. At OU-1, the fence and gate are in good condition and restrict unauthorized access to the site. There have been no changes in the physical conditions of the site that would affect the protectiveness of the remedy. No asbestos was detected in the on-site groundwater monitoring wells.

Issues, Recommendations, and Follow-Up Actions

This report does not identify any issues or make any recommendations for follow-up activities that are necessary, in addition to the engineered, access and institutional controls currently in place, or to be put in place shortly, for the protection of public health and the environment. Due to the presence of asbestos containing materials present in the landfill areas of the properties of the site, periodic sampling should continue to be conducted.

Protectiveness Statement

The implemented remedies for OU-1 and OU-2 of the Asbestos Dump Superfund Site currently protect human health and the environment because there are no exposure pathways that could result in unacceptable risks and none expected as long as the engineered, access and institutional controls are properly monitored and maintained and the site uses remain consistent with the remedy.
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I. Introduction

This second Five-Year review for Operable Unit One and Operable Unit Two of the Asbestos Dump Superfund Site (Site), located in Millington, Morris County, New Jersey, was conducted by the U.S. Environmental Protection Agency (EPA) Remedial Project Manager (RPM), Mary Anne Rosa. The Agency is preparing this five-year review pursuant to Section 121(c) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended, 42 U.S.C. §9601 et seq. and 40 CFR 300.430(f)(4)(ii), and in accordance with the Comprehensive Five-Year Review Guidance, OSWER Directive 9355.7-03B-P (June 2001). The purpose of five-year reviews is to assure that implemented remedies remain protective of human health and the environment and that they function as intended by the decision documents. This report will become part of the Site file.

This is the second Five-Year review for the Asbestos Dump Site. The triggering action for this review is the date of the first Five-Year review for this site, which was completed in September 2000.

The Asbestos Dump Superfund Site (Site) was addressed in three operable units (OUs). The first operable unit (OU-1), the Millington parcel, is a property located in Millington, NJ. The second operable unit (OU-2) covers the New Vernon Road and White Bridge Road properties, which are located in Meyersville, NJ. The third operable unit (OU-3) covers the Dietzman Tract, which is located in the Great Swamp National Wildlife Refuge in Harding Township, NJ and is under Federal Facilities jurisdiction. This Five Year Review covers only OU-1 and OU-2.

OU-3 is under Federal Facilities jurisdiction. A Five Year Review for OU-3 is being prepared by the US Department of Interior/Fish and Wildlife Service as a separate report.

II. Site Chronology

Table 1 summarizes some Site-related events from discovery to the present.

<table>
<thead>
<tr>
<th>TABLE 1 - Chronology of Site Events</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Event</strong></td>
</tr>
<tr>
<td>Manufacturing of asbestos products began at Millington plant</td>
</tr>
<tr>
<td>Asbestos containing material dumped at OU-1 Millington property</td>
</tr>
<tr>
<td>Event</td>
</tr>
<tr>
<td>----------------------------------------------------------------------</td>
</tr>
<tr>
<td>Asbestos containing materials dumped at OU-2 and OU-3 properties</td>
</tr>
<tr>
<td>Site placed on the National Priorities List</td>
</tr>
<tr>
<td>EPA issued Notice Letter to National Gypsum Company</td>
</tr>
<tr>
<td>EPA issued Administrative Order on Consent to National Gypsum to conduct the RI/FS</td>
</tr>
<tr>
<td>National Gypsum performed RI</td>
</tr>
<tr>
<td>RI Report submitted; (EPA deemed it adequate for Millington property but not for the other contaminated properties and divided site into separate OUs)</td>
</tr>
<tr>
<td>OU-3 Dietzman Tract ROD</td>
</tr>
<tr>
<td>OU-1 Millington - ROD</td>
</tr>
<tr>
<td>EPA issued UAO to National Gypsum to perform RD/RA at OU-1</td>
</tr>
<tr>
<td>EPA collected and analyzed soil and dust samples from OU-2</td>
</tr>
<tr>
<td>National Gypsum filed for bankruptcy</td>
</tr>
<tr>
<td>Removal activities at OU-2 conducted</td>
</tr>
<tr>
<td>OU-2 RI/FS</td>
</tr>
<tr>
<td>EPA conducts Risk Assessment</td>
</tr>
<tr>
<td>OU-2 New Vernon Road and White Bridge Road - ROD</td>
</tr>
<tr>
<td>OU-2 Remedial Action begins</td>
</tr>
<tr>
<td>The Remedial Action Report for the White Bridge Road portion of OU-2 was approved</td>
</tr>
<tr>
<td>EPA acquires the OU-2 New Vernon road property</td>
</tr>
<tr>
<td>Construction Complete (Close Out Report)</td>
</tr>
<tr>
<td>First Five-Year Review completed</td>
</tr>
<tr>
<td>EPA approved the Remedial Action Report for the New Vernon Road portion of OU-2</td>
</tr>
<tr>
<td>EPA approved the OU-1 Remedial Action Report and 30 Year Operation and Maintenance Plan</td>
</tr>
<tr>
<td>EPA deleted the OU-2 White Bridge portion of the Site from the NPL.</td>
</tr>
</tbody>
</table>
A 25 acre portion of the New Vernon Road property was formally transferred to FWS and is now part of the Great Swamp National Wildlife Refuge.

### III. Background

**Site Location and Description**

The Asbestos Dump Superfund Site (Site) consists of four separate properties located in southeastern Morris County, New Jersey. These four properties are: ① the Millington parcel located in Millington, New Jersey; ② the New Vernon Road parcel located in Meyersville, New Jersey; ③ the White Bridge Road parcel located in Meyersville, New Jersey; and ④ the Dietzman Tract located in the Great Swamp National Wildlife Refuge in Harding Township, New Jersey. Manufacturing of asbestos products began in 1927 at the Millington site. Waste products containing asbestos were disposed on all four properties. EPA proposed the Asbestos Dump Site to the National Priorities List (NPL) on December 1, 1982 and added it to the final list on September 1, 1983.

The Asbestos Dump Site was addressed in three operable units (OUs). A Record of Decision (ROD) for the first operable unit (OU-1), the Millington parcel (Figure 1), was signed on September 30, 1988. A ROD was signed on September 27, 1991 for the second operable unit (OU-2), the New Vernon Road and White Bridge Road properties (Figure 2). The ROD for the third operable unit (OU-3), the Dietzman Tract, was signed on September 8, 1998. Since the OU-3 portion of this site is under Federal Facilities jurisdiction, the Five Year Review report for OU-3 was prepared by the Federal Facility as a separate report.

**Geology/Hydrogeology**

The geology/hydrogeology at the site consists of unconsolidated sedimentary deposits that are present throughout the area in various thicknesses. The existence and spatial distribution of these deposits is typical of glacial and swamp deposits.

**History of Contamination**

From the 1930's through the 1970's asbestos manufacturing took place on the Millington property. During this period, waste products, consisting of broken siding and asbestos fibers were dumped on a portion of the property. This included a 330 foot by 75 foot area (referred to as the asbestos mound) where predominantly asbestos fibers, siding and roofing material were disposed. During the 1960's and 1970's, asbestos containing materials were also dumped on the OU-2 New Vernon Road and White
Bridge Road properties as well as the OU-3 Dietzman property.

Initial Response

In September 1984, EPA issued a notice letter to the National Gypsum Company (NGC) notifying the company of its liability as a potentially responsible party (PRP) and offering the company an opportunity to conduct a remedial investigation and feasibility study (RI/FS). On April 1, 1985, EPA issued an Administrative Order on Consent to NGC to conduct the RI/FS at the four properties comprising the Asbestos Dump Site. In May 1987, NGC submitted an RI Report to EPA which adequately characterized the contamination at the Millington site. However, the RI Report inadequately characterized the nature and extent of contamination at the other properties. In September 1989, EPA issued a Unilateral Administrative Order (UAO) to NGC, for the performance of the remedial design and remedial action at the Millington site. In October 1990, NGC filed a voluntary bankruptcy petition. In May 1991, EPA filed a Proof of Claim for past costs at the Millington, New Vernon Road and White Bridge Road sites.

EPA was awarded settlement costs for the remediation of the Millington site, New Vernon Road and White Bridge Road sites. As part of the settlement agreement, NGC was relieved of its remedial design/remedial action obligations under the 1989 Administrative Order.

Basis for Taking Action

Operable Unit One - Millington property

OU-1 is located at 50 Division Avenue in Millington, New Jersey (known as Block 119 Lot 1 on the Long Hill Township tax map). OU-1 is an industrial property currently owned by Tifa Realty Inc. It is approximately 11 acres of land bounded on the west by the Passaic River, on the east by a New Jersey Transit Station, a residential area to the north and Stone House Road to the south.

A large mound of asbestos contaminated material (ACM) was disposed of on the western edge of the property adjacent to the Passaic River. The RI/FS activities for OU-1 were completed in November 1987. Asbestos was found on site in the form of broken asbestos tiles, siding and fibers. The quantity of asbestos waste estimated on-site was 90,000 cubic yards. The waste was primarily dumped on the site property creating a mound of asbestos waste adjacent to the Passaic River. Exposed areas of asbestos were observed on the slope of the asbestos mound. On September 30, 1988, EPA issued a Record of Decision (ROD) documenting the remedial action for the Millington parcel. The selected remedy included the installation of security fences, soil cover, slope protection/stabilization and surface water
Operable Unit Two - New Vernon Road and White Bridge Road

The OU-2 New Vernon Road property is located at 237 New Vernon Road in Meyersville, Long Hill Township, Morris County, New Jersey (known as Block 225 - Lots 30 and 30.03 on the Long Hill Township tax map). The New Vernon Road property consists of approximately 30 acres of land and is bounded by the Great Swamp National Wildlife Refuge (GSNWR) to the north, tracts of wooded and wetland areas to the east and south, and New Vernon Road to the west. The property includes one habitable residence, one inhabitable residence and a large garage structure.

The White Bridge Road parcel of OU-2 consists of approximately 12 acres of land located at 651 White Bridge Road as well as adjoining property, which is part of the Great Swamp National Wildlife Refuge, in Meyersville, New Jersey. This parcel is bounded by White Bridge Road to the north, the Great Swamp National Wildlife Refuge to the east and southeast, Black Brook to the southwest and a vacant wooded lot to the west. One private residence is located on the parcel. An asphalt driveway located in the northwest portion of the property allows access to a two story dwelling, garage, two sheds and three stables.

During the 1960's and 1970's asbestos containing material (ACM), consisting of asbestos tiles and siding, was disposed of as fill on the properties. The RI/FS activities for OU-2 were completed in June 1991. During RI/FS activities, EPA collected and analyzed soil and dust samples at the New Vernon Road and White Bridge Road properties. The data indicated the presence of elevated levels of asbestos. EPA determined that an immediate removal action was necessary to address the imminent threat posed by the sites. Removal activities were conducted at both properties in the fall of 1990 to temporarily reduce the potential for airborne asbestos fibers and to restrict access. Removal activities included installation of fences, air and soil sample collection, decontamination of the residences, and visual inspection of asbestos containing material.

On September 27, 1991, EPA issued a ROD documenting the remedial action for the New Vernon Road and White Bridge Road properties. The selected remedy included the excavation and consolidation of contaminated material followed by the in-situ stabilization/solidification of asbestos containing material.

IV. Remedial Actions

Remedy Selection/Implementation

Operable Unit One
Remedial action activities for the Millington property, were performed according to design specifications and include, but were not limited to, the following activities:

- clearing and grubbing of roots, stumps, and logs on the asbestos mound;
- excavation and consolidation of asbestos contaminated soils to an on-site disposal area;
- soil erosion and sediment control measures;
- construction of a wetland channel;
- installation of a 300 foot long by eight foot high retaining wall at the base of the asbestos mound;
- slope stabilization measures;
- installation of a two foot soil cover over the entire asbestos mound;
- site restoration activities including grading and revegetation of the site; and
- construction of a chain-link fence around the perimeter of the site to restrict access.

EPA entered into an Inter Agency Agreement with the U.S. Army Corps of Engineers for the performance of the RA. The RA began in June 1999 and was completed in June 2000. In September 2001, EPA approved the Remedial Action Report as well as the 30 Year Operation and Maintenance (O&M) Plan. NJDEP is currently conducting O&M activities.

Operable Unit Two

In August 1994, EPA’s remedial action contractor, CDM Federal Programs Inc., initiated remedial action activities at both the New Vernon Road and White Bridge Road properties.

Remedial action activities at both properties were performed according to design specifications and included, but were not limited to, the following activities:

- sampling and analyzing soils to define the area of contamination;
- perimeter and personnel air monitoring;
- excavation and consolidation of asbestos contaminated materials into a central area of the property;
- in-situ stabilization/solidification of the asbestos contaminated material;
- confirmatory soil sampling;
- backfilling the excavated area;
- construction of a two foot impermeable layer over the solidified material;
- installation of a perimeter infiltration trench; and
- regrading and revegetation of the site.

Operable Unit Two - White Bridge Road
At the White Bridge Road property, the remedial action subcontractor, Geo-Con Inc., completed remedial construction activities in October 1995. Approximately 25,000 cubic yards of asbestos contaminated material was treated at the White Bridge Road property. A pre-final site inspection was held on October 26, 1995. On November 1, 1995, a final inspection produced no punch list items for field work, except for filling/grading the low areas of the impermeable cover with topsoil. Final completion of field work was confirmed with the November 2, 1995 inspection by EPA and the remedial action contractors.

After implementation of the remedy, it was discovered that some of the fill, used by the remedial action contractor originated from a facility subject to the New Jersey Environmental Cleanup Responsibility Act, now the Industrial Site Recovery Act. On April 7, 1995, EPA deemed the fill unacceptable and issued a Cure Notice for both New Vernon Road and White Bridge Road properties, to CDM Federal for failure to meet the contract specifications for the use of fill. On August 15, 1995, EPA accepted a final Cure Notice Response Workplan for the White Bridge Road property. The Cure Response for the White Bridge Road property included: placement of a three inch layer of stone screening over the unacceptable fill at the stable area and removal of five cubic yards of unacceptable fill located within the stockpile at no cost to EPA. In December 1997, the Remedial Action Report for the White Bridge Road portion of OU-2 was approved. In April 2000, EPA conducted activities at White Bridge Road to re-establish the vegetative cover and installation of a trench drain on the surface of the cap. In February 2002, EPA deleted the White Bridge Road portion of the Site from the NPL.

Operable Unit Two - New Vernon Road

The Cure Response at the New Vernon Road property included the removal of all unacceptable fill, at no cost to the government. Approximately 30,000 cubic yards of unacceptable backfill material was remediated at the New Vernon Road property. In June 1998, the government acquired the New Vernon Road property and maintained the structures and property. The Cure Response cleanup activities at New Vernon Road were initiated in July 1998 and completed by March 1999. The USACE provided oversight of the Cure Response cleanup activities. In September 2000, EPA approved the Remedial Action Report for the New Vernon Road portion of OU-2.

In January 2002, EPA, NJDEP and the U.S. Fish and Wildlife Service (FWS) reached an agreement on the terms of the transfer of a portion of the New Vernon Road property to FWS to expand the Great Swamp National Wildlife Refuge. In September 2002, a 25 acre portion of the New Vernon Road property was formally transferred to FWS and is now part of the Refuge. USFWS is conducting O&M on the 25 acre parcel of property. The remaining 5
The acre portion of the New Vernon Road property, which contains the area of solidified asbestos containing material, was transferred to the State of New Jersey. NJDEP is conducting O&M on the 5 acre parcel of property.

In June 2000, EPA issued a Preliminary Close-Out Report for the Site, documenting that all construction activities at the Site had been completed.

**Operation and Maintenance**

Post remedial environmental groundwater monitoring was conducted at OU-1 and OU-2 in April 2005. Results indicate no asbestos in the groundwater. The State is responsible for the O&M activities at OU-1 and OU-2.

OU-1 and a portion of OU-2 are privately owned. EPA is in the process of preparing a Deed Notice that will be placed, by the owners of the property, on the OU-1 portion of the Site. A deed notice has already been placed on the White Bridge Road property. The deed notice prohibits the construction of any building on the remediated portions of the property containing treated asbestos containing materials and outlines the maintenance activities for which the owner is responsible (such as inspection of the grass cover for rodent intrusion, condition of site fence, etc...).

**V. Progress Since the Last Review**

The first Five-Year review was conducted in September 2000, pursuant to OSWER Directives 9355.7-02 (1991), 9355.7-02A (1994) and 9355.7-03A (1995). The results of this second Five-Year review document the effectiveness of the remedy and indicate there is no significant off-site migration of contaminants. The current site uses for OU-1 and OU-2 remain consistent with the selected remedies.

**VI. Five-Year Review Process**

**Administrative Components**

The Five-Year review team consisted of Mary Anne Rosa, Remedial Project Manager (for OU-1 and OU-2); Diana Cutt, Hydrogeologist; Marian Olsen, Risk Assessor; and Tom O’Neill, NJDEP.

**Community Notification and Involvement**

EPA notified the community of the initiation of the Five-Year review process by publishing a notice in the Courier News, on September 17, 2005. The notice indicated that EPA would be conducting a five year review of the remedy at the Asbestos Dump
Site to ensure the remedy remains protective of public health and is functioning as designed. The notice included the RPM’s address and telephone number for questions related to five-year review process. In addition, the notice indicated that once the five-year review is completed, the results will be made available to the public at the Long Hill Township Free Library, 91 Central Avenue, Stirling, New Jersey 07980 and EPA Records Center. The RPM has not been notified of any concerns with the remedies for OU-1 and OU-2 based upon this public outreach.

Document Review

The list of documents, data, and information which were reviewed in completing this second Five-Year review are found in Appendix A. In addition to the Site visit, the following documents, data and information were reviewed in completing the Five-Year Review:

- Remedial Action Reports;
- RODs;
- Historical and analytical data;
- Operation and Maintenance Plans; and
- U.S. EPA Guidance for conducting Five-Year Reviews and other guidance and regulations to determine if any new applicable or relevant and appropriate requirements (ARARs) relating to the protectiveness of the remedy have been developed since EPA issued the ROD.

Data Review

The data reviewed included the data from the first Five-Year review and subsequent groundwater monitoring data. In April 2005, groundwater samples were collected, by NJDEP, from seven monitoring wells located at OU-1 and six monitoring wells located at OU-2. No asbestos was detected in the on-site groundwater monitoring wells.

Groundwater Monitoring

In April 2005, NJDEP collected a round of groundwater samples from wells located on OU-1 and OU-2 properties. Data indicated that there was no asbestos detected in any of the groundwater samples.

Site Inspection - OU-1 and OU-2

The site inspection was conducted on May 23, 2005, by EPA representatives, NJDEP representatives, and USDOI representatives. The purpose of the site inspection was to assess the protectiveness of the remedy. The fence surrounding the OU-1 Millington portion of the site remains intact and there
are no visible signs of trespassing onto the site. The landfill caps on OU-1 and OU-2 of the site are properly maintained. Soil erosion was not evident at Site.

No significant issues were identified during the inspection. All the engineering controls appear intact and in good condition.

NJDEP and USDOI/FWS have been conducting O&M activities including inspection of the landfills.

Overall, the inspection provided the following findings:
- final cover of the landfills are in good condition;
- drainage/detention basins are in good condition;
- there is no damage to the locks, casings or caps of the groundwater monitoring wells;

Each ROD for each OU provided for exposure protection through containment. The applicable or relevant and appropriate requirements used at that time are still relevant to this Site.

Interviews

The site remedies were discussed with New Jersey Department of Environmental Protection representatives and Township representatives. There were no interviews with community representatives.

Institutional Controls

Appropriate institutional controls have been implemented at OU-1 and OU-2. The owner of the OU-1 Millington property has signed a Consent Decree agreeing to abide by the environmental restrictions on the affected area of the property. A Deed Notice memorializing these environmental restrictions has been drafted and provided to NJDEP for review. The OU-1 property owner has agreed to file the appropriate Deed Notice after resolution of certain issues with NJDEP. At this time, the State of New Jersey is responsible for performing O&M activities for this property.

The OU-2 New Vernon Road property was separated into two lots. The State of New Jersey owns the five acre parcel with the landfill. USDOI owns the remaining 25 acre parcel of the property on which a residence and garage structure are located. Appropriate Deed Notices have been filed in the Morris County Clerk’s Office for each parcel. The State of New Jersey is responsible for monitoring the environmental restrictions placed on the OU-2 New Vernon Road 5 acre landfill parcel of property. USDOI is responsible for the operation and maintenance of the 25 acre parcel of property.
On January 5, 2001, the owners of the OU-2 White Bridge Road property filed a Deed Notice with the Morris County Clerk. EPA and the State of New Jersey agreed on the terms of the Deed Notice, which require the property owners to conduct periodic maintenance activities on the cap. The State of New Jersey is responsible for performing O&M activities that are not performed by the property owner for this portion of the Site.

VII. Remedy Assessment

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

Yes, the remedy is functioning as intended in the ROD.

**Question B:** Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives used at the time of the remedy still valid?

The OU-1 remedy included the excavation and consolidation of asbestos contaminated soils to an on-site disposal area; soil erosion and sediment control measures; installation of a 300 foot long by eight foot high retaining wall at the base of the asbestos mound; slope stabilization measures; installation of a two foot soil cover over the entire asbestos mound; site restoration activities including grading and revegetation of the site; and construction of a chain-link fence around the perimeter of the site to restrict access.

The OU-2 remedy included the excavation and consolidation of asbestos contaminated materials into a central area of the property; in-situ stabilization/solidification of the asbestos contaminated material; confirmatory soil sampling; backfilling the excavated area; construction of a two foot impermeable layer over the solidified material.

The remedies remain protective since routes of exposure (i.e., ingestion, inhalation and dermal contact with contaminated soil) have been interrupted, due to the liners and two foot soil and vegetative cap placed over the landfills, to potential receptors.

**Operable Unit One**

The OU-1 remedy provides a barrier to direct exposure through inhalation, ingestion and dermal contact and remains protective. Institutional controls are in place in order to prevent potential damage to the cap. At the time of the site inspection, the cap appeared to be well maintained.
The New Jersey Department of Environmental Protection conducted OU-1 groundwater sampling for asbestos in May of 2005. The sampling results indicated non-detects for all samples (< 0.42 million fibers/liter or MFL). These values are below the MCL for asbestos of 7 MFL.

At the current time, the Integrated Risk Information System (IRIS) has identified asbestos for further evaluation of non-cancer toxicity. The cancer assessment for asbestos has not changed since added to the IRIS file in 1987. EPA will evaluate any changes in the toxicity information at the next five year review.

**Operable Unit Two**

The OU-2 portion of the site, the New Vernon Road and White Bridge Road properties, includes approximately 30 acres of land. The original risk assessment identified asbestos containing materials as the chemical of concern under residential exposure assumptions. The land use of this property has not changed. The New Jersey Department of Environmental Protection conducted groundwater sampling at OU-2 for asbestos in May of 2005. The sampling results indicated non-detects for all samples (< 0.42 million fibers/liter or MFL). These values are below the MCL for asbestos of 7 MFL.

The soil cap and the solidified asbestos containing material provide barriers to exposure. As noted above, the Agency is currently re-evaluating the toxicity of asbestos and this information should be evaluated in the next five year review. The current remedy remains protective since exposures to the contaminated material are not occurring.

Since the OU-1 ROD and OU-2 ROD were signed, new guidance has been issued regarding the evaluation of vapor intrusion at sites with volatile organic compounds. The guidance issued in 2001 is titled “OSWER Draft Guidance for Evaluating the Vapor Intrusion to Indoor Air Pathway from Groundwater and Soils (subsurface vapor intrusion guidance)”. Based on the nature of the contaminants at the site that include asbestos and metals, and the unlikely development of this property, further evaluation of the vapor intrusion pathway was not conducted.

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

No, the toxicity values and exposure assumptions remain consistent with those developed during the original RODs. Future
changes in toxicity and exposure assumptions will need to be evaluated in the next 5 year review.

**Remedy Assessment Summary**

- The soil and vegetated caps appear effective;
- The fence around the OU-1 portion of the Site is in good condition;
- Groundwater monitoring wells have been sampled and will continue to be sampled; and
- There is no significant evidence of trespassing, vandalism or damage at the Site.

This Site has ongoing O&M activities, conducted by NJDEP.

**VIII. Issues, Recommendations and Follow-Up Actions**

This report does not identify any issues or make any recommendations for follow-up activities that are necessary, in addition to the engineered, access and institutional controls currently in place, or to be put in place shortly, for the protection of public health and the environment. Due to the presence of asbestos containing materials present in the landfill areas of the properties of the site, periodic sampling should continue to be conducted.

**IX. Protectiveness Statement**

The implemented remedies for OU-1 and OU-2 of the Asbestos Dump Superfund Site currently protect human health and the environment because there are no exposure pathways that could result in unacceptable risks and none expected as long as the engineered, access and institutional controls are properly monitored and maintained and the site uses remain consistent with the remedy.

**X. Next Review**

Since hazardous substances, pollutants or contaminants remain at the Asbestos Dump Site at levels which do not allow for unlimited use or unrestricted exposure, EPA will conduct another Five-Year
Review by September 2010.

Approved:

[Signature]

George Pavlou, Director
Emergency and Remedial Response Division
9-20-05
Date
Figure 1 - Site Map
Figure 2 OU-2 Site Map
APPENDIX A

List of Documents Reviewed

- OU-1 Revised Closure Plan Approval—Minor Modification, Methane Gas Venting System, dated September 16, 2004; by NJDEP
- OU-1 Record of Decision, EPA, September 1998
- OU-2 Record of Decision, EPA, September 1991
- Groundwater Monitoring Data, April 2005
- Five-Year Review Report, September 1999
- Remedial Investigation data
- Site Maps
# APPENDIX B

## List of Acronyms

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
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<tbody>
<tr>
<td>ARAR</td>
<td>Applicable or Relevant and Appropriate Requirement</td>
</tr>
<tr>
<td>CERCLA</td>
<td>Comprehensive Environmental Response, Compensation, and Liability Act</td>
</tr>
<tr>
<td>EPA</td>
<td>United States Environmental Protection Agency</td>
</tr>
<tr>
<td>CFR</td>
<td>Code of Federal Regulations</td>
</tr>
<tr>
<td>MCLs</td>
<td>Maximum Contaminant Levels</td>
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<tr>
<td>NJDEP</td>
<td>New Jersey Department of Environmental Protection</td>
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<tr>
<td>NCP</td>
<td>National Oil and Hazardous Substances Pollution Contingency Plan</td>
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<td>NPL</td>
<td>National Priorities List</td>
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<tr>
<td>O&amp;M</td>
<td>Operation and Maintenance</td>
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<tr>
<td>PQL</td>
<td>Practical Quantitation Levels</td>
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<td>Resource Conservation and Recovery Act</td>
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<td>Remedial Investigation/Feasibility Study</td>
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<tr>
<td>ROD</td>
<td>Record of Decision</td>
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<td>SARA</td>
<td>Superfund Amendments &amp; Reauthorization Act</td>
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<tr>
<td>VOC</td>
<td>Volatile Organic Compound</td>
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