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August 23, 2010

Mr. Diego Garcia
New Jersey Remediation Branch
Emergency & Remedial Response Division
UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY, Region II
290 Broadway, 19th Floor
New York, New York 10007-1866

Dear Mr. Garcia

Re: Administrative Order on Consent (02-2004-2033)
Remedial Investigation Report
Operable Unit Two
Radiation Technology, Inc. Superfund Site
Rockaway Township, New Jersey

Please find enclosed four (4) paper copies and one electronic copy of the following final report:

Remedial Investigation Report
Operable Unit 2
Radiation Technology Inc. Superfund Site
Rockaway Township, New Jersey
August 2010

Also enclosed are Alliant Techsystems Inc.'s responses to USEPA comments dated July 14, 2010, on the Draft Remedial Investigation Report.

Should you have any questions regarding this submission, please do not hesitate to contact me at (952) 351-5511.

Sincerely,
ALLIANT TECHSYSTEMS INC.

Karie Blomquist, P.E.
Remediation Engineer

Enclosure

307226

cc: Office of Regional Counsel; EPA (1 hard copy)
Roman Luzecky; NJDEP (1 hard/1 CD)
Robert Martin; CRA (1 hard/ 1 CD)
Eileen Mahoney; Eileen Mahoney Associates, Inc. (1 hard)
Craig Huber; Archer & Greiner (1 hard)

Responses to U.S. EPA Comments dated July 14, 2010
Draft Remedial Investigation Report
Operable Unit Two (OU2)
Radiation Technology, Inc. Superfund Site
Rockaway Township, New Jersey

General Comments:

1. **EPA Comment**: *Please reference and incorporate the January 8, 2007, Phase lA Cultural Resource Reconnaissance Survey and the July 2004, Preliminary Assessment for the undeveloped portions of the site in the final RI.*

   ATK Response: The Phase IA Cultural Resource Reconnaissance Survey and the July 2004, Preliminary Assessment for the undeveloped portions of the site are incorporated into the final Remedial Investigation (RI) Report.

Remedial Investigation Report:

2. **EPA Comment:** *Page 8, 6th paragraph; page 27, 4th paragraph; page 42, 2nd paragraph; figure 3.9: It is stated that test pits TPS8A and TPS8B appear to indicate the presence of waste material beyond the defined investigation area and that Nuclear Regulatory Commission (NRC) documents suggest that some buried drums and debris may remain in vicinity of this area. While it is understood that ATK's position is that no further investigation on the part of ATK is applicable, EPA believes that additional delineation work maybe warranted and should be conducted during the remedial design.*

   ATK Response: Comment noted. ATK does not offer an opinion in the RI as to whether additional delineation or investigation work by others is warranted.

3. **EPA Comment:** *Page 34, 4th paragraph: It is recommended that the term 'Impact to Groundwater Soil Remediation Standard' (IGWSSL) be used throughout the Report in lieu of the term 'Groundwater Protection Soil Screening Level' (GPSSL) to be consistent with terminology used in NJDEP Regulations and to minimize confusion as to whether GPSSL is the same as IGWSSL or refers to something different.*

   ATK Response: The term "Groundwater Protection Soil Screening Level" (GPSSL) was changed to "Impact to Groundwater Soil Remediation Standard" (IGWSSL) throughout the report.

4. **EPA Comment:** *Page 46, Section 4.4 - Please remove this section. A discussion regarding EPA's activities at the R TI site will be presented in subsequent documents.*

   ATK Response: Section 4.4 was deleted.

5. **EPA Comment:** *Page 52 and 53 - the words "neurotoxin" and "renal toxin" are being misused. A toxin is by definition is a poisonous substance that is a specific product of the metabolic activities of a living organism, such as snake venom. The chemicals at the R TI site are not products of metabolic activities of living organisms. The word toxin should be replaced with toxicant.*

   ATK Response: The word toxin was replaced with toxicant.

6. **EPA Comment:** *Page 55, Section 6.2.6 - Please add additional text that describes the hazard index and the evaluation of target organ effects in this section. EPA suggests using similar text from the human health risk assessment.*

   ATK Response: Section 6.2.6 was modified to describe the hazard index and the evaluation of target organ effects similar to that presented in the human health risk assessment.

7. **EPA Comment:** *Page 58, Section 7.2. Second conclusion; while samples taken from Tank T-51 revealed low concentrations of aromatics, EPA believe that the feasibility study should recommend that the tank be removed.*

   ATK Response: Per EPA's request, ATK will include a recommendation in the feasibility study regarding the removal of Tank T-51; however, it will be noted in the feasibility study that removal of this tank is not the responsibility of ATK.

   ATK investigated the Tank T-51 in accordance with the Administrative Order on Consent (AOC). The tank contents were sampled and analyzed for VOCs, metals, energetic and pH. As presented in the Draft RI, the results indicated the residual material in the tank is indicative of a weathered petroleum/fuel oil material with no hazardous wastes commingled with the petroleum material. Therefore, in accordance with the EPA's letter dated December 29, 2003, regarding the RI/FS Draft AOC, ATK is not responsible for remediation/removal of the tank because the tank contents are petroleum in nature.

Human Health Risk Assessment

8. **EPA Comment:** *Page 10, item 5 - Please revise the text to read "if no carcinogenic or non-carcinogenic chemicals are present".*

   ATK Response: Agreed.

9. **EPA Comment:** *Page 1 0, Section 3 .2.4, first sentence - Please add "with 20 or more samples" after "total samples".*
ATK Response: Agreed.

10. **EPA Comment:** *Page 30, last paragraph - Although currently the screening tables that can be accessed through EPA Regions 3, 6, or 9 websites are identical, that was not always true in the past. Depending upon which Regional version of the Preliminary Remediation Goals (PRG) table that was utilized in the risk assessment, this paragraph may not be accurate. A more accurate statement would be to say that the analytical data was screened using the Region 9 PRG table and that the Region 9 PRG table has since been combined with the screening tables from Region 3 and 6. It would be beneficial to include an additional statement that indicates which values were changed, if any, from the Region 9 PRG table to the" new combined Regional Screening Level (RSL) tables.*

ATK Response: The screening values used in the HHRA are the RSLs. This is stated in the final sentence on page 30. In order to make this as clear as possible, the reference to Region IX will be removed and all screening values will be identified as RSLs.

11. **EPA Comment:** *Page 36, last paragraph - Please add a sentence or two that describes the hazard index of 3.1 for the industrial worker and the organ-specific evaluation, similar to the text on page 28.*

ATK Response: Agreed.

12. **EPA Comment:** *Appendix Table 3 - Several of the target organs listed in the target column section of this table do not compare with the target organs presented in Table 5.1. Please revise to make both tables consistent with each other.*

ATK Response: The target organ for aluminum in Appendix Table 3 will be revised to state CNS. Thallium is not included in Table 5.1 because it was not identified as a COPC in site soil, surface water, or sediment. The remaining target organs listed in Appendix Table 3 are correct.

Screening Level Ecological Risk Assessment

13. **EPA Comment:** "*Page 11, Section 3.4, first sentence - Please add "also" between "were" and "used".*

ATK Response: The sentence has been changed as requested.

14. **EPA Comment:** *Page 21, Sections 4.3.1, 4.3.2, 4.3.3, and 4.3.4 - Please clarify if No Observed Adverse Effect Level (NOAELs) or Lowest Observed Adverse Effect Level (LOAELs) were used in these sections.*

    ATK Response: These sections have been clarified specifying NOAEL and LOAEL as appropriate.

15. **EPA Comment:** *Page 28, second paragraph, third sentence - While EPA supports the use of visual observations as a line of evidence, the conclusion from this sentence is not accurate. Please change the sentence to read "All of the various ecological niches appeared to be present at the site, which indicates that the ecosystem is likely functioning at a high level."*

    ATK Response: The sentence "All of the various ecological niches were present at the site, a situation that exists only when it is healthy and visually unimpacted." Has been changed to "All of the various ecological niches appeared to be present at the site, which indicates that the ecosystem is likely functioning at a high level."

16. **EPA Comment:** *Page 32, Mercury, last paragraph - Please add atmospheric deposition to the likely source of mercury into the surface water bodies.*

    ATK Response: The sentence "As mercury in surface soil is likely the source of mercury in surface water and sediment, it is likely that mercury in these media is not site-related." Has been changed to "As mercury in surface soil or atmospheric deposition is likely the source of mercury in surface water and sediment, it is likely that mercury in these media is not site-related."

17. **EPA Comment:** *Page 32, last paragraph -It is indicated that four metals have NOAEL hazard quotients (HQs) above 1, however there appear to be five (antimony, chromium, cadmium, lead, and manganese).*

    ATK Response: The parenthetical "(less than 7, four metals with NOAEL HQs just slightly higher than 1.0)" has been changed to "(less than 7, five metals with NOAEL HQs just slightly higher than 1.0)".