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

February 21, 2017

Mr. Brian J. Bussa
Ford Motor Company
290 Town Center Drive, Suite 800
Dearborn, MI 48126

Re: November 2016 Site-Related Groundwater Ecological Assessment Report
Ringwood Mines/Landfill Site, Ringwood, New Jersey

Dear Mr. Bussa:

The U.S. Environmental Protection Agency (EPA) has completed review of the November 2016 Site-Related Groundwater Ecological Assessment Report (EA Report) for the Ringwood Mines/Landfill Site. EPA's comments have been attached to this letter.

In accordance with the May 2010 Administrative Order on Consent, CERCLA Docket No. 02-2010-2020, a revised EA Report which fully addresses the attached comments should be submitted to EPA and NJDEP within twenty-one (21) days of the date of this letter.

If you have any questions concerning this matter, please call.

Sincerely yours,

Joseph A. Gowers, Project Manager
New Jersey Remediation Branch

cc: M. Kleczkowski, Arcadis
K. Petrone, NJDEP
L. Dodge, Excel
S. Heck, Borough of Ringwood
C.Coslett, demaximis

EPA COMMENTS ON THE NOVEMBER 2016 SITE-RELATED GROUNDWATER ECOLOGICAL ASSESSMENT FOR THE RINGWOOD MINES/LANDFILL SITE

1.- Page iv, Acronyms and Abbreviations – The acronym "ADD" (average daily dose) should be included in this section.

2.- Page E-3, Executive Summary - This section should be revised to include a discussion of the derivation of the revised TRVs.

3.- Page 2-6, Section 2.3.2, Last Sentence – This sentence should be revised to indicate that the Borough of Ringwood production wells are located in a different subwatershed rather than watershed.

4.- Section 6.2, Sediment Pathway - The discussion of the refined avian TRVs provides alternative NOAEL and LOAEL values for copper and lead. These alternative TRVs should be provided in Table 8 or an additional table to clearly show HQs generated with the revised TRVs. This document should be revised accordingly.

5.- Section 8 Summary and Conclusions - As indicated in Comment #4, the calculated avian HQs for copper and lead using the refined TRVs should be provided in Table 8 or in a new table.

6.- Table 2 - There appears to be inconsistencies regarding the number of sediment samples collected, in comparison to Table 11. These inconsistencies should be addressed in a revised document.

7.- Table 11 - "Mazimum" should be revised to read "Maximum."

8.- Table 11 - This table identifies 13 samples for VOCs and 14 samples for SVOCs, PCBs, and inorganics, while Table 2 indicates 13 samples for each sediment analysis. Further, in the discussion of sediment samples in the Executive Summary it is noted that the sediment dataset consisted of 13 rather than 14 samples. Please clarify and correct these inconsistencies.

9.- Figure 2 - It is unclear what the difference between background and off-site samples are. Clearly indicate whether all background/off-site samples were included in the background dataset.