UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

AUG 12 1996

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

MEMORANDUM

SUBJECT: National Remedy Review Board Recommendations on the Roebling Steel Company Superfund Site

FROM: Bruce Means, Chair
National Remedy Review Board

TO: Richard L. Caspe, Director
Emergency and Remedial Response Division
EPA Region 2

Purpose.

The purpose of this memorandum is to document the findings of the National Remedy Review Board (NRRB) on the proposed remedial action for the Roebling Steel Company Superfund Site in Florence Township, New Jersey.

Background.

As you recall, the Administrator established the NRRB as one of the October 1995 Superfund Administrative Reforms to help control remedy costs and promote consistent and cost-effective decisions. The Board will review all proposed cleanup actions where: (1) the estimated cost of the preferred alternative exceeds $30 million, or (2) the preferred alternative costs more than $10 million and is 50% more expensive than the least-costly, protective, ARAR-compliant alternative. In its review, the NRRB considers the nature and complexity of the site; health and environmental risks; the range of alternatives that address site risks; the quality and reasonableness of the cost estimates for alternatives; regional, State/tribal, and other stakeholder opinions on the proposed actions (to the extent they are known at the time of review); and any other relevant factors or program guidance.

Generally, the NRRB makes "advisory recommendations" to the appropriate Regional decision maker before the Region issues the proposed plan. These recommendations are then to be included in the Administrative Record for the site.

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While the Region is expected to give the Board's recommendations substantial weight, other important factors, such as subsequent public comment or technical analyses of remedial options, may influence the final Regional decision. It is important to remember that the NRRB does not change the Agency's delegation authorities or alter in any way the public's current role in site decisions. This Reform is intended to focus the program's extensive experience on decisions at a select number of high stakes sites.

NRRB Findings.

The NRRB reviewed the proposed plan for the Roebling Steel Company site, along with other relevant site information, and discussed related issues with EPA Regional Project Manager Tamara Rossi on June 25, 1996. Based on this review and discussion, the NRRB generally supports the Agency's proposed cleanup strategy as presented in Alternative 3 of the proposed plan. However, the NRRB makes the following observations:

- The NRRB suggests that the Region consider an additional alternative that would consist of: (1) demolishing the "A Buildings" (those buildings that are contaminated and structurally unsound) and disposing the contaminated debris in an on-site landfill; and (2) decontaminating the "B Buildings" (which are also contaminated but structurally sound) to a risk level suitable for the expected future use. This recommendation should not be viewed as a proposal to select this alternative; only as a suggestion to evaluate it alongside others considered.

- Alternative 1, identified in the draft Proposed Plan as "*no further action with institutional controls*," should be amended to evaluate only *"no further action"* in order to establish the true baseline condition. Institutional controls should not be included as part of a no action alternative.

- Alternative 2, as it is explained in the draft proposed plan, does not appear to pass the NCP threshold criteria. It does not address lead contamination in the buildings, which contributes significantly to site risks.

- If the Region chooses Alternative 3, the Board believes that fine-tuning the building-specific decontamination strategies may save money during remedial design. For this analysis it may help to evaluate the per-building cost for varying decontamination levels and compare that data to the target residual risk levels. The Region should consider using value engineering to explore these opportunities.

- The Board encourages the Region, during the post-ROD remedial design phase, to continue working with potential site developers to determine the level of

building decontamination necessary for potential future use. The remedy should not spend resources on decontaminating buildings for future use if the buildings will later be demolished by site developers.

The NRRB appreciates the Region's efforts to work closely with the State and community to identify the current proposed remedy. The Board especially wants to thank the Region and the State of New Jersey for their participation in the review process. The Board encourages Region 2 management and staff to work with their Regional NRRB representative and the Headquarters Region 2/6 Regional Accelerated Response Center to discuss appropriate follow-up actions.

Please do not hesitate to give me a call at 703-603-8815 if you have any questions.

cc: S. Luftig
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