Hi everyone and thanks to all our members for your continued support of our work to monitor and help energize and communicate about the AmCy (American Cyanamid) Superfund remediation and cleanup. We are approaching a climactic moment in regard to defining the Imp. 1,2 remediation plan (FFS and EPA Proposed Plan), and that is the primary purpose of this letter. I have to say at this point we don't know the EPA's proposed plan, so we don't know if we will be in favor, fairly neutral or strongly against. Whichever, the whole membership should be ready to come out at the public meeting to be held in next couple of months. See below for more.

First I want to briefly update on our management and on the real progress treating (continuously) the highly contaminated groundwater under the site.

## **Management and Award:**

- Board of Trustees remains same: Pete hamerslag, John Tucciarone and Ross Stander (exec. chairman).
- John Tucciarone has retired as Treasurer with Ross taking over a few of the durites that John handled so capably since 1992. We owe John a fantastic debt of gratitude for his decades of work as Treasurer and for continuing as an active Board member.
- Jim Crane took over in 2016 as TAG Manager for administration and other Project Director functions, especially as related to EPA-grant financial and government regulatory matters.
- Casey Kittel has been our web-site manager since 2012 when he designed our website and has since maintained and upgraded it. www.crisistoxicwatch.org
- Dr. Ira Whitman, PE has been our Technical Adviser since late 2012 and you have been reading his excellent TA Reports since then which give technical updates and very useful tutorial information on relevant topics.
- TAG grant from EPA Region 2: We have been the TAG recipient since 1993 time frame; we received a new \$50,000 3-year version in early 2013, and have been extended for a year at a time (with no added funds), the last at Aug. 31, 2017.
- Award: We received one of the EPA Reg. 2 Environmental Champion Awards in May 2016 recognizing our decades of work for the environment of Somerset County.

## Groundwater control progress is very good news:

- CRISIS fought for a dedicated GW treatment plant since early 2000's so that VOCs and heavy metal contaminants could be specifically treated with best modern technologies.
- Pfizer took up this cause when it became the AmCy responsible party (RP) around 2009, and agreed with EPA to set it as first priority on the site.

- Modular temporary GWTP installed by Pfizer in 2012 and with other site improvements (to intercept and pump-for-treatment seepage from Imp. 1,2) drove benzene in Raritan River from about 200 ppB (before) to about 0.15 ppB after (measured at the River location adjacent to these impoundments).
- Permanent GWTP with modern technologies is now under construction (near the big Imp. 8 RCRA impoundment on the site along Polhemus Rd.) with likely operation by first part of 2019. Should be a winner for the community.

## Impoundment 1,2 Status and Situation -- the Big Question:

- Regarding Imp. 1,2, see Dr. Whitman's many TA Reports on our website now (which
  were also distributed to members and our larger community via emailings) about the
  toxic benzene and other VOC and metal contamination, and the difficulty finding a
  workable technology to fully remediate these tar-type toxic materials. Each about 2
  acres, these impoundments are adjacent to the River, so are particularly dangerous to
  the environment, especially in large floods where toxic material can potentially overflow
  protective berms and move into the Raritan River.
- These 2 impoundments were separated out from the rest of the remediation plans for separate study and a FFS (focused feasibility study).
- Pilot study done in 2014 by Pfizer (to volatilize the VOCs and capture the emitted VOC residues in high tech equipment) is almost certainly not in the EPA plan because of fire and explosion hazard and problems to scale-up such an operation.

## Where are we now on Imp. 1,2 and what is coming:

- Draft FFS report by Pfizer, with multiple remediation alternatives, sent to EPA last summer. Not yet released to CRISIS.
- EPA selected its "proposed plan" (not yet released to CRISIS or to Pfizer) and presented it to an EPA National Remedy Review Board (NRRB) on Oct. 26, 2017. Neither CRISIS nor Pfizer were invited to that meeting.
- CRISIS submitted in October 2017 a letter to EPA and for the NRRB review -- giving its analysis of the alternatives and preferred choices (for Imp. 1,2). The detailed matrix analysis was done by our TA and Exec. Chairman.
- Most specifically our letter says we are entirely opposed to any plan that leaves Imp. 1,2
  materials in place near the River (whether treated, solidified or left untreated) because of
  the danger to the river environment including danger to the public. This letter to EPA
  and NRRB is published on our website for you or anyone to read.
- Please see the end of our letter for what we favor as remedy.
- We understand informally that the NRRB is generally supportive of the EPA-Reg. 2
  proposed plan. Note that even Pfizer says it is not privy yet to the EPA Proposed Plan
  or selection of remedy.
- Next step is for EPA-Reg. 2 to review the Proposed Plan with EPA-headquarters in Washington up to top level (Administrator Scott Pruitt), within a couple of weeks.
- CRISIS and general public will then be notified of decision.

• A Public Meeting on the Proposed Plan will then be held, probably in March or April. I believe we will then have a short time to respond, perhaps 30 days.

We hope you will check out the letter, look for the notice from EPA and CRISIS as to the selected remedy by EPA, and perhaps look at the FFS when released by EPA. And follow CRISIS's reaction as to whether we support it, are neutral or strongly oppose.

Most importantly, please attend the public meeting in March or April, and be ready to give EPA your vigorous feedback.

Best regards, Ross Stander, Exec. Chairman