



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

January 4, 2021

By Electronic Mail

Scott Kahan, Regional Chief
National Wildlife Refuge System
United States Department of the Interior
Fish and Wildlife Service
300 Westgate Center Drive
Hadley, MA 01035-9589

Re: Rolling Knolls Landfill Superfund Site, Chatham Township, New Jersey

Dear Mr. Kahan:

This will respond to your November 25, 2020 letter, which follows up on our November 19, 2020 conference call. Enclosed, as requested, please find the U.S. Environmental Protection Agency's (EPA's) comments on the draft Feasibility Study report for the Rolling Knolls Superfund site (site). In preparing its comments to the 2018 draft Feasibility Study report, EPA reviewed and considered comments submitted to EPA by the New Jersey Department of Environmental Protection and by the U.S. Fish and Wildlife Service (FWS). EPA has provided its comments to Chevron Environmental Management Company, Nokia of America Corporation (f/k/a Alcatel-Lucent USA Inc.) and Novartis Pharmaceuticals Corporation, the potentially responsible parties performing the Remedial Investigation/Feasibility Study (RI/FS) for the site under EPA oversight pursuant to the 2005 Administrative Settlement Agreement and Order on Consent for Remedial Investigation and Feasibility Study, and is directing them to incorporate EPA comments and submit a draft final Feasibility Study report to EPA for approval. EPA expects to prepare and release for public comment a proposed plan for the site in the early part of 2021.

We appreciate the effort, work and comments the FWS and the US Department of the Interior (DOI) have provided throughout the RI/FS process for the site, and we expect to continue working with FWS/DOI as we move forward with response work for the site. While we have not always agreed on certain aspects of the investigation and remedy development process for the site, EPA does value the input and advice provided by FWS/DOI and continues to welcome their participation in the process.

With respect to the sampling work the FWS intends to undertake on the portion of the landfill located in the Great Swamp National Wildlife Refuge, as we have said before, we have concluded that we have sufficient data for the site for EPA to select a remedial action to address the risks posed by contamination in soil/sediment at the site. EPA is directing the PRP group to not move forward with groundwater alternatives in this FS; groundwater will be addressed in a separate decision. With respect to the sampling work that the FWS intends to take, as we have stated, EPA will consider use of data collected by the FWS at future phases of the project (e.g., pre-design investigation, future remedy selection addressing potential groundwater issues), as appropriate.

As we discussed during our November 19, 2020 conference call, EPA is conducting a high-level review

of the Quality Assurance Project Plan and the Conceptual Site Model and Data Gaps Evaluation Technical Memorandum FWS submitted to us on October 30, 2020 to determine if the plan is generally consistent with EPA's understanding of the needs of the site, as well as EPA data quality objectives. We expect to complete this review by February 2021.

EPA understands that the FWS/DOI have a unique role at the site as both a federal natural resource trustee and a potentially responsible party and we will continue to ensure that the FWS/DOI participate in the Superfund process with respect to both of its roles for the site.

Please let us know if you have any questions.

Sincerely,

Angela Carpenter, Chief
Special Projects Branch

Enclosure

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| cc: | Wendy Weber, | FWS |
| | Kimberly Childe, | DOI, Office of the Solicitor |
| | George Molnar, | FWS |
| | Michael Horne, | FWS |
| | Stephanie Vaughn | EPA-SPB-MPS |
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