



U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION II

Superfund and Emergency Management Division
290 Broadway
New York, New York 10007

Monday, December 28, 2020

John L. Persico, P.G.
Principal
Geosyntec Consultants
7 Graphics Drive
Ewing, NJ 08628

Re: Rolling Knolls Landfill Superfund Site Draft Feasibility Study Comments

Dear Mr. Persico,

Attached please find the U.S. Environmental Protection Agency (EPA) comments to the draft Feasibility Study (FS) Report submitted to EPA by Geosyntec Consultants on behalf of Chevron Environmental Management Company for itself and Kewanee Industries, Nokia of America Corporation (f/k/a Alcatel-Lucent USA Inc.) and Novartis Pharmaceuticals Corporation (collectively, the Group) on July 31, 2018 and updated on September 14, 2018 for the Rolling Knolls Landfill Superfund site (Site) in Chatham Township, New Jersey. As you know, the New Jersey Department of Environmental Protection (NJDEP), and the U.S. Department of the Interior (DOI) in coordination with the U.S. Fish and Wildlife Service (FWS), have reviewed and commented on the July 2018 draft FS Report. The attached comments incorporate, to the extent appropriate, the comments and concerns raised by NJDEP and DOI.

On June 23, 2020, EPA provided you with a revised version of the Executive Summary (ES) of the draft FS Report. As was explained at that time, significant changes to the revised draft FS report are needed, and many of the changes are reflected in the revised ES; these changes should be carried through to the rest of the document. EPA made one relatively minor additional change to the ES since providing it in June, and the updated version is attached to this letter.

The attached general and specific comments are in addition to those required by the updated revised ES, though some may also be reflected by the revised ES. To help provide clarity to the changes required, below is a summary of the key changes in the revised ES that need to be carried through to the body of FS Report:

- Ensure that the chronology of the text of the FS is reflective of the order used in the revised Executive Summary.
- Some terminology used in the ES has been revised for clarity and accuracy (for example, the word constituent should be changed to contaminant, most references to soil should be to soil/sediment).
- PAHs were added to the discussion of analytical results of soil.

- Groundwater will be addressed in a future decision document. As such, all language related to groundwater remedial alternatives should be removed from the main body of the report (e.g., Section 7). A description of the groundwater contamination at the Site consistent with the language used in the ES should be included in the revised FS. Note that while groundwater contamination will be addressed in a future decision document, groundwater should be monitored during and after implementation of the soil remedy. The soil remedial alternatives should include language regarding groundwater monitoring.
- The Remedial Action Objectives have been revised to reflect that the FS will be addressing soil/sediment contamination only.
- For clarity in interpretation, the remedial alternatives addressing soil/sediment contamination have been rewritten.
- As in the ES, a brief description of the Remedial Investigation (RI), Baseline Human Health Risk Assessment (BHHRA) and Baseline Ecological Risk Assessment reports should be added to the introduction of the revised FS report.
- Since the last draft of the FS from July 2018, restrictive covenants have been put in place for the Trust property of the Landfill. The Executive Summary has been revised to include this change.
- Note that passive recreation is allowed on the USFWS portion of the Site. Risks related to site contamination for passive recreators would be similar to trespassers on the Trust property. Therefore, language has been included in the Executive Summary regarding passive recreators. Please include a description of passive recreators in the FS for the USFWS property consistent with the Executive Summary. Also mention passive recreators when mentioning trespassers, where appropriate.
- The discussion of the BHHRA has been expanded.
- The soil/sediment remedial alternatives table in the ES which summarizes the evaluation criteria has been revised for precision and accuracy.
- Language regarding the finding that no unacceptable risks related to surface water and sediment has been added.

While the fundamental elements of the soil/sediment alternatives evaluated in the 2018 draft of the FS Report remain largely unchanged, significant revisions to the draft FS Report are required to clearly and definitively describe the remedial alternatives. Given the significant revisions needed, EPA will perform a thorough review of the next draft of the FS Report.

Please let me know if you have any questions or if you would like to discuss this matter further. EPA requests that a revised document be submitted by Wednesday, January 27, 2021.

Thank you,



Supinderjit Kaur
Remedial Project Manager

cc:

Gary Fisher, Alcatel Lucent