



Rolling Knolls Landfill Site Community Advisory Group Meeting

January 14, 2021

Robert P. Blauvelt PhD, PG,
LSRP, CHMM

- Technical Advisor
- Over 30 years experience
- Previously worked for NJDEP
- NJ based environmental consulting practice
- Areas of Expertise
 - Landfill assessment
 - Soil and ground water investigation
 - Site investigation



Frances Schultz PG, LSRP

- Project Manager
- Bachelors and Masters degrees in Geology
- Over 30 years experience
- NJ based environmental practice
- Areas of Expertise
 - Site investigation
 - Site Remediation
 - Brownfields



AGENDA

Documents Reviewed
EPA Feasibility Study Comments
Questions

Photo source: cumulis.epa.gov



Documents Reviewed

- 24 Documents provided by GSWA resulting from FOIA request
- 12 Documents from EPA Rolling Knolls Landfill Superfund Website
- 5 Additional Documents from GSWA with additional documents provided by EPA on January 4, 2021
- Objective – Evaluate adequacy of RI/RS and recommended remedy



Key EPA Documents

- ASTDR Risk Assessment 2006
- Remedial Investigation Report
- Screening Level Ecological Risk Assessment
- Baseline Human Health Assessment



FOIA Request Results

- Feasibility Study Report Final Draft July 2018
- Correspondence
 - To and from EPA, DOI, FWS, NJDEP, Township of Chatham, Township of Millburn, Lowenstein and Sandler
- DOI Environmental Compliance Memoranda
- EPA comments to FS dated 12/20/2020

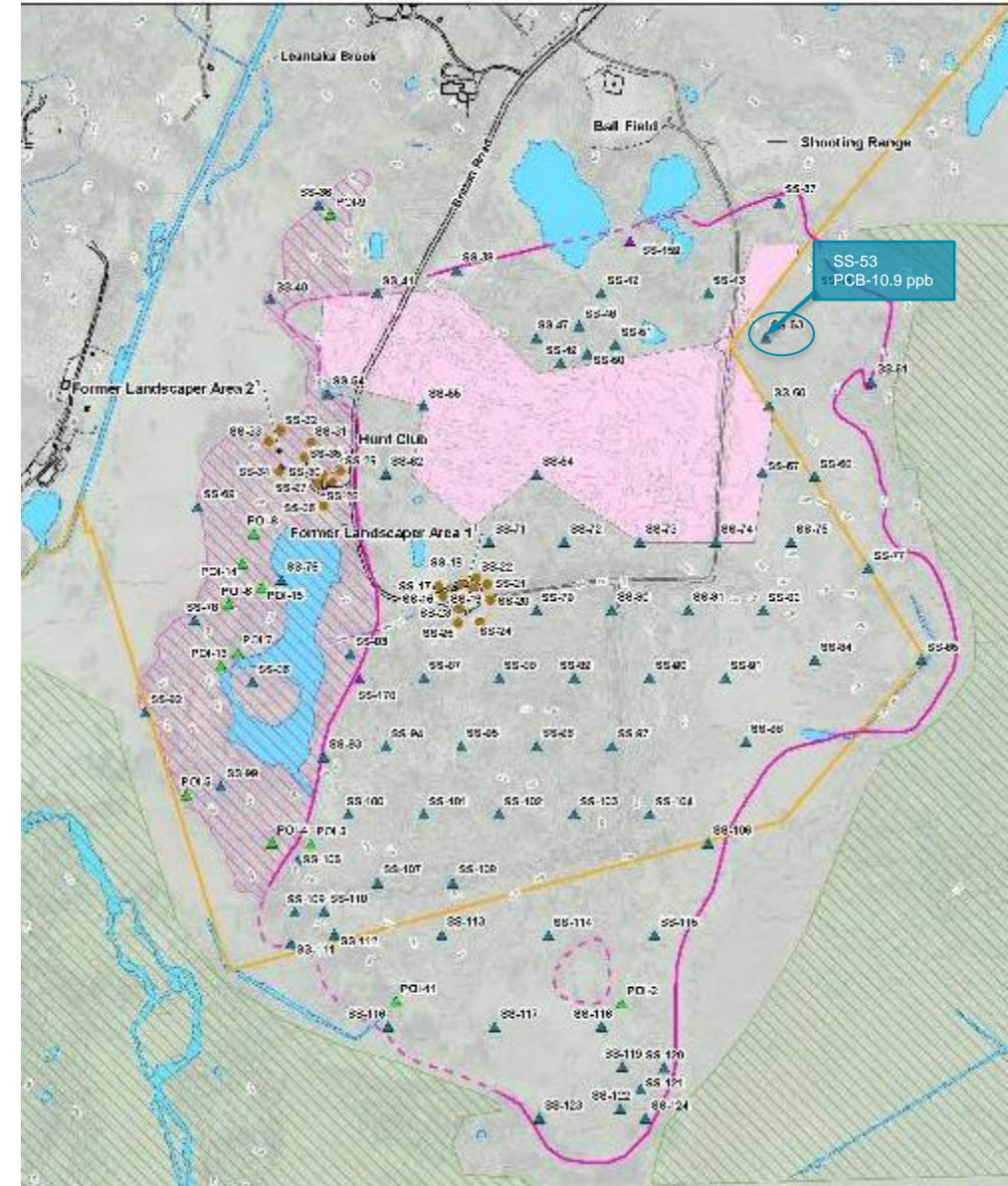


Feasibility Study Comments



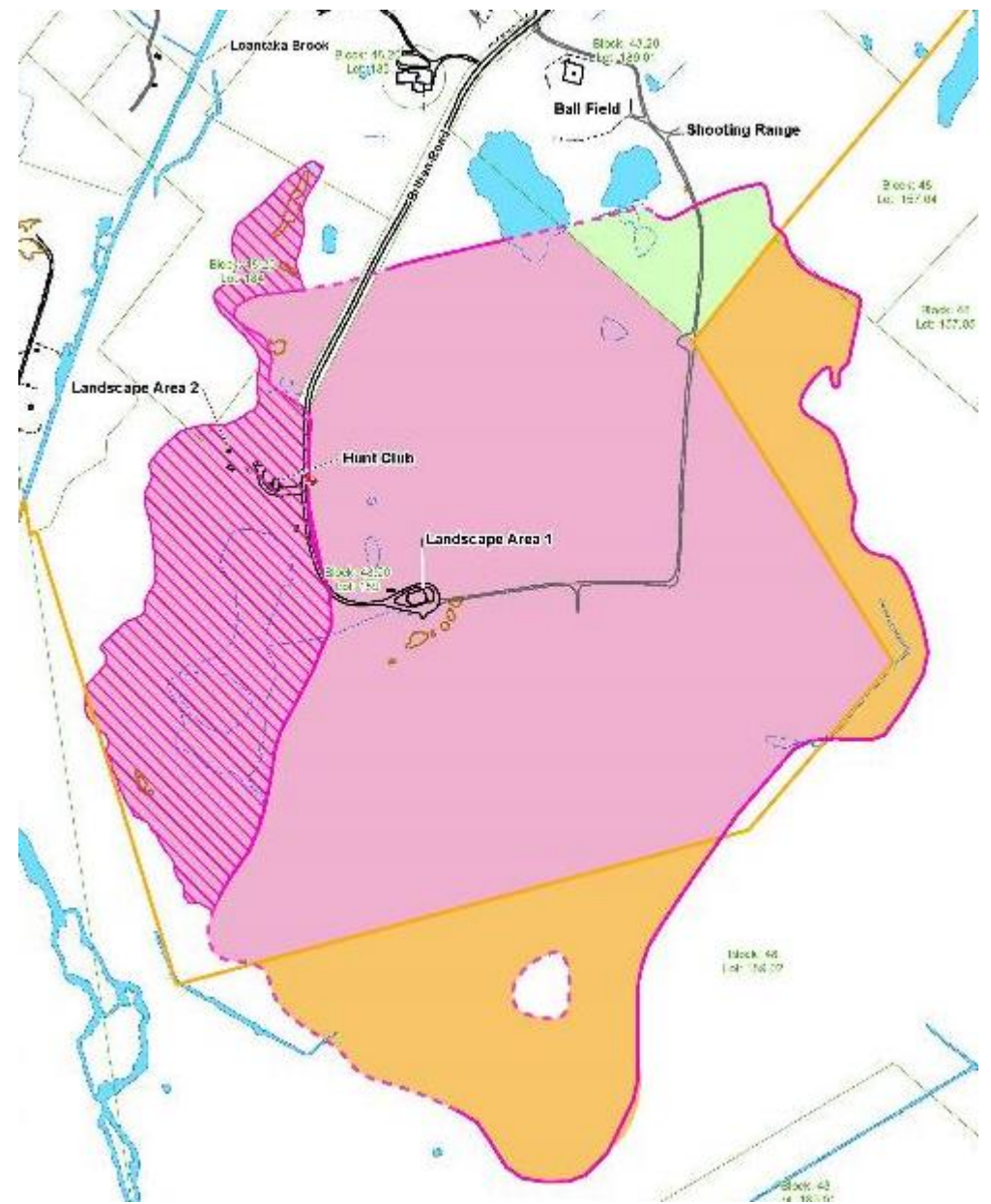
GSNWR and Rolling Knolls Landfill

- Rolling Knolls landfill
 - 170 acres
 - Operated from 1930's through 1968
 - Received sanitary, municipal and industrial waste including over 100 drums.
- GSNWR 7,8000 acres established in 1960
 - Designated Wilderness Area
 - Approximately 35 acres within RKLK footprint
- Selected Area (In Pink) - PCB area of focus in RA alternative analysis



Future Use

- GSNWR Wilderness Area (gold) – Passive non-intrusive recreation e.g. hiking, hunting, birdwatching etc.
- Trust Property (pink) – disposal company laydown area to extent EPA consents. Trust documents preclude future development
- Shooting range and ball field (green) – Will discontinue use
- EPA restrictions will preclude development or intrusive activity these areas



Remedial Alternatives

Evaluation Criteria	Soil Remedial Alternatives				
	1 No Action	2 Site Controls- Institutional, Fencing, Signage	3 Site Controls, Cap Selected Area, Hot spot Remediation, and Remediation of Non-Vegetated Areas with Soils Above Remediation Goals	4 Same as Alternative 3 except Excavation and Off-Site Disposal of Selected Area	5 Site Controls and Capping of All Landfill Material
Overall Protection of Human Health and the Environment	NA	Does Not Meet NCP Criterion	Meets NCP Criterion	Meets NCP Criterion	Meets NCP Criterion
Costs	NA	\$761,000	\$16,525,000 to \$21,099,000	\$32,831,000 to \$57,792,000	\$55,430,000

Evaluation Criteria	Groundwater Remedial Alternatives		
	1 No Action	2 Source Control and Monitoring	3 Source Control and Monitoring with a Contingent Remedy
Overall Protection of Human Health and the Environment	Does Not Meet NCP Criterion	Meets NCP Criterion	Meets NCP Criterion
Costs	\$0	\$1,345,000	\$2,815,000

For Soil Alternatives 3 and 4, the range of costs reflects differing remedial approaches included within the alternative.

NCP -National Contingency Plan

*includes ranges within the sub-categories



Concerns- Remedial Investigation

- Remedial Investigation
 - Preliminary Remediation Goals not developed for ecological exposures
 - Completion of contaminant delineation deferred to remedy design phase
 - Distribution of contaminant impacts end (arbitrarily) at the Refuge boundary



Concerns – Feasibility Study

- Feasibility Study
 - Ground water not included in selection/recommendation of remedial alternative
 - Remedy selection based solely on human health. Risks to ecological receptors not considered
 - Cost range of recommended alternative overlaps with those that are more protective
 - Recommended alternative does not close landfill in accordance with NJDEP regulations
 - Recommended alternative leaves uncapped landfill waste on the Refuge and restricts its future use



What's next?



Upcoming Activities

- US Fish and Wildlife Service - additional characterization sampling on the Refuge.
- USEPA - PRP Group to revise the FS for soils only in response to comments (revision in early 2021).
- USEPA - complete review of October 30 Technical Memorandum from FWS by February 2021.



Questions

