

General Comments

	Section	Comment
1	General	A comprehensive predesign investigation (PDI) will be required to fully delineate the areas that need to be addressed both vertically and horizontally, as well as to close any data gaps. Please include language in the FS clearly stating this and briefly describing the activities needed. Previously provided comments regarding data gaps, including those provided by NJDEP in June 2015 on the April 2015 Addendum 1 to the QAPP and Addendum 1 to the Data Gaps SAP, should be incorporated into the PDI, as appropriate.
2	General	A small portion of the northern end of the Surface Debris Area may extend onto the property located at 110 Britten Road in Green Village. As such, this area will need to be sampled during the PDI activities. If contamination is found on this property at concentrations exceeding New Jersey residential direct contact soil remediation standards (NJRDCSRs), it will need to be addressed to residential standards. Please revise the FS Report to include this issue.
3	General	<p>During an April 2019 site visit with EPA and NJDEP staff, evidence of a possible discharge was noted adjacent to the outlet of a half-buried culvert located in the northeastern portion of the site. The closest existing sample to this immediate area is SS-53 (located approximately 150 feet east of the aforementioned “outlet”). It should be noted that SS-53 exhibits 1,110 mg/kg of Lead and 10.9 mg/kg of PCBs at 0-1 feet below grade.</p> <p>An evaluation of this drainage feature should be conducted during the Pre-Design Phase. This evaluation should include, but not be limited to: a determination of the length, orientation, construction specifications and purpose of this culvert; characterization of the material being transported within this drainage structure; and sampling of both the water and sediment/soil at the outlet of this culvert, so that a determination can be made about how to address any potential unacceptable risks.</p>
4	General	The fence configuration presented in the Draft FS extends only partially around the landfilled portions of the Site. Please include a discussion, in the remedial alternatives and where appropriate elsewhere, that the eastern, southeastern and southern portions of the Site will rely on natural barriers (i.e., dense vegetation and trees) as an engineering control to prevent access to portions of the Site. Also, incorporate a discussion of the effectiveness of each of the natural barriers that are being considered in lieu of a fence. Note that since the natural barriers will be a part of the remedy they should not be removed.

Rolling Knolls Landfill Draft 2018 FS Report – EPA Comments

		Please note that signage or some other form of demarcation must be utilized in those areas where natural barriers, alone, are being relied upon for access control. A description of all engineering controls associated with the Site, including natural barriers, signage, fencing, etc. will also need to be included in any deed notice / deed notice equivalents filed for the site as will a mapped location of the different controls being relied upon and a discussion as to how these controls will be maintained.
5	General	Please update the appropriate sections, tables, and figures, as necessary, to stipulate that any areas where contamination exceeding the NJRDCSRS will remain following remedy implementation, requires a deed notice or equivalent institutional control. Please include language that all Deed Notices (or equivalent institutional controls) established for the Site will clearly indicate all land uses that are restricted under the selected remedial action conditions.
6	General	When mentioning landfill cap in the remedial alternatives, please include a discussion of how soil gas will be addressed.
7	General	Please include SED-007 as an Area of Particular Concern (APC). All appropriate sections of the FS Report should be revised accordingly.
8	General	Please change "GSWNR" to "GSWNR Wilderness Area" where appropriate.
9	General	When mentioning limiting access to the landfill, please clarify in the text that this refers to the privately-owned portion of the property.
10	General	Please change "owned by the United States and the Fish and Wildlife Service (USFWS)." to owned by the United States and managed by the Fish and Wildlife Service (USFWS). "
11	2.7	Please add a section on Test Pits and change the numeric designations of the remaining sections.
12	6	Please remove the following text: "to the extent practicable and consistent with engineering best practices..." from the whole section.
13	6	In Section 6.3.1 and 6.4.1, please add the following text: "Based on existing data, this alternative may allow a significant area of the landfill to remain with no final impermeable cover to restrict the flow of water into and through the waste material potentially allowing for migration of contaminants into the shallow groundwater, surface water, soil and sediment. A long-term monitoring program will be implemented to ensure human health risks remain at acceptable levels."

14	6	In section 6.3.1 and 6.4.1, please revise the first sentence to read: "The results of the BERA indicate that exposures to COPECs in the environmental media at the Site do not pose an unacceptable ecological concern for most of the evaluated receptors and that there is a low potential risk for vermivorous birds and mammals."
15	6	In section 6.3.1 and 6.4.1, please remove the following language "These findings, coupled with the presence of a varied ecological community similar to that found in similar habitats in New Jersey, results in high confidence that any potential residual ecological risk following remedy implementation is negligible. The existing ecological habitats within the 25-acre Selected Area, which includes old field habitat, mature tree stands, and peripheral wetlands, would be eliminated and replaced with maintained grassy areas which have lower ecological value than the existing vegetated habitats. In addition, small areas of potential habitat for the federally threatened and State endangered bog turtle and blue-spotted salamander, as well as mature trees that are potential roosting habitat for the federally threatened and State endangered Indiana bat, would be lost permanently."
16	6	In section 6.3.1 and 6.4.1, please add the following text: "Therefore, any potential residual ecological risk following remedy implementation is considered negligible. A significant portion of the landfill would remain with no final impermeable cover, and the potential remains for contaminants in the waste material to migrate into surrounding soil, groundwater, surface water and sediments. The GSNWR Wilderness Area is hydrologically downgradient of the landfill and any contaminants from waste not contained by an impermeable cover have the potential to migrate to the wilderness area. A long-term monitoring program will be implemented to ensure human health and ecological risks remain at acceptable levels."
17	6	In section 6.3.3. and 6.4.3, please revise the sentence to read "This alternative will employ Site controls (i.e., institutional controls, fencing, and signage) on the privately owned portion of the landfill. These controls are widely used,..."
18	6	In section 6.3.4, 6.4.3, and 6.4.4, please include the following text: "Approximately 100 acres of landfill waste will not be capped allowing for the potential mobility of contaminants remaining in the waste located in this area"
19	6	In section 6.3.5 and 6.4.5, revise the following sentence to read: "Including access and staging footprints, this alternative will impact approximately 3 to 7 acres of wetlands which will need to be mitigated. The actual area and value of wetlands

Rolling Knolls Landfill Draft 2018 FS Report – EPA Comments

		requiring mitigation will be determined during the PDI and remedial design."
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