



## State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION  
Bureau of Case Management  
Mail Code 401-05F  
P.O. Box 420  
Trenton, New Jersey 08625-0420  
Telephone: 609-633-1455

CHRIS CHRISTIE  
*Governor*

KIM GUADAGNO  
*Lt. Governor*

BOB MARTIN  
*Commissioner*

April 11, 2017

Ms. Betsy Donovan  
United States Environmental Protection Agency  
New Jersey Remediation Branch  
290 Broadway, 19<sup>th</sup> Floor  
New York, NY 10007-1866

Re: Rolling Knolls Landfill  
35 Britten Road  
Chatham Township, Morris County  
PI #: G000004411  
Activity Number: RPC080001  
*Document Reviewed: Technical Memorandum -Development and Screening of Remedial Alternatives (Dated - March 2017)*

Dear Ms. Donovan:

The New Jersey Department of Environmental Protection (NJDEP) has completed its review of the above referenced Development and Screening of Remedial Alternatives (DSRA) Technical Memorandum. This document was submitted by Geosyntec on behalf of the Rolling Knolls Settling Parties. The objective of the DSRA Technical Memorandum is to identify and evaluate potential remedial alternatives and to select appropriate alternatives to be carried forward for more detailed evaluation in the feasibility study.

The following five Remedial Alternatives were developed for soil:

- \* No Action;
- \* Site Controls (i.e., Institutional Controls and Access Restrictions);
- \* Site Controls, Excavation, and Off-Site Disposal of Selected Areas to Reduce Overall Risk;
- \* Site Controls and Capping of Selected Areas to Reduce Overall Risk; and
- \* Site Controls and Capping of All Landfill Material.

The following four Remedial Alternatives were developed for ground water:

- \* No Action;
- \* Monitored Natural Attenuation (MNA);
- \* MNA with Source Control; and
- \* Biological Treatment and MNA with Source Control.

Source control measures may include containment, in-situ treatment, removal, or disposal/discharge. Biological treatment (e.g., enhanced reductive dechlorination, aerobic bioremediation, phytoremediation) would include injection of material to degrade compounds or using plants to remove, stabilize, or destroy constituents. Institutional controls (a Classification Exception Area (CEA) and a Well Restriction Area (WRA)) would be used to prohibit ground water use.

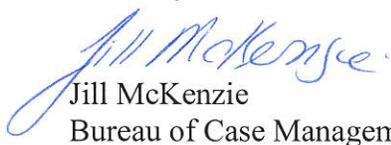
The NJDEP offers the following comments:

1. Information and data in the DSRA are presumed to be accurate as presented.
2. The DSRA notes the USEPA range of acceptable Human Health risks is  $1 \times 10^{-6}$  to  $1 \times 10^{-4}$ . While the acceptability of the formal risk assessment is deferred to EPA, remediation for this site must comply with NJDEP Departmental policy and New Jersey statutes such that all contaminants present in concentrations above one-in-a-million cancer risk ( $1 \times 10^{-6}$ ) and above an HQ of 1 are addressed either by remediation or institutional/engineering controls.
3. Based upon the information and screening presented in the DSRA, the NJDEP concurs with the recommendation that all the Remedial Alternatives noted in the DSRA be retained for full evaluation in the feasibility study.

Please incorporate these comments, as appropriate, into the letter that the USEPA will be sending to the Rolling Knolls Settling Parties.

Thank you for your cooperation in this matter. If you have any questions, please call Jill McKenzie at (609) 292-1993, or via email at [Jill.McKenzie@dep.nj.gov](mailto:Jill.McKenzie@dep.nj.gov).

Sincerely,

  
Jill McKenzie  
Bureau of Case Management

cc: Jill McKenzie, BCM  
Steve Byrnes, BEERA  
Dave VanEck, BGWPA