



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Great Swamp National Wildlife Refuge
241 Pleasant Plains Road
Basking Ridge, NJ 07920



April 12, 2017

Betsy Donovan
United States Environmental Protection Agency
290 Broadway
New York, NY 10007-1866

Re: Rolling Knolls Landfill Superfund Site
Draft Development and Screening of Remedial Alternatives (DSRA) Technical Memorandum

Dear Ms. Donovan:

Comments on the Draft DSRA Technical Memorandum for the Rolling Knolls Landfill Superfund site is enclosed for your review.

Should you have any questions or concerns, please do not hesitate to contact me at (973) 425-1222, Extension 163, or george_molnar@fws.gov.

Sincerely,

George Molnar
Remedial Activities Coordinator/Contaminants Biologist



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United States Fish and Wildlife Comments on the Draft Development and Screening of Remedial Alternatives Technical Memorandum for the Rolling Knolls Landfill Superfund Site

Comment 1: Only four of the twenty-two ARARs and TBCs provided by USFWS to EPA and the Group via email on August 17, 2016, were included on Table 4-1 of the document. As the DSRA Tech Memo states, approximately 30 acres of the Site is located on a National Wildlife Refuge and includes a designated Wilderness Area. The Site-specific ARARs and TBCs provided by USFWS must be considered when evaluating remedial alternatives for the portion of the Site on federal land. Kindly revise the DSRA to include these ARARs and TBCs in the final document or provide justification as to why they were excluded.

Comment 2: Section 6.2.1 Soil (Soil Alternatives 4 and 5). Based on current information, USFWS supports Alternative 4 (Site Controls and Capping of Selected Areas to Reduce Overall Risk) and Alternative 5 (Site Controls and Capping of All Landfill Material) as the most sensible and reasonable remedy alternatives, due to their ability to prevent any direct exposure of on-Site contaminants with human and ecological receptors. However, the DSRA Tech Memo opines that the implementability of such these alternatives would be greatly reduced by excessive truck traffic from hauling in material, and the increased cost and emissions associated with such activities. The Tech Memo also notes concern regarding replacement of existing on-Site habits.

USFWS, EPA, and the Group have discussed on multiple occasions the possible use of on-Site material for a landfill cap. It is well-documented that the underlying clay unit at the Site is well in excess of 50 feet thick. Use of this on-Site material would eliminate most, if not all of the concerns related to hauling in material from off-Site sources, and would ultimately result in a considerable reduction in costs. In addition, a cap constructed of clay would essentially be impermeable, reducing future impacts to groundwater and surrounding surface water and sediments through leaching. The construction of landfill caps using on-Site clays have been successfully implemented at Operable Unit 3 of the Asbestos Dump Superfund Site and Harding Landfill site located a short distance away at the Great Swamp National Wildlife Refuge (Refuge).

Regarding on-Site habitats, current conditions indicate a disturbed vegetative community over a majority of the Site, dominated by ruderal species comprised of both non-native and native species. Many of these communities are intermixed with miscellaneous trash and debris providing limited habitat quality. Constructing a cap and seeding with native species, such as warm season grasses and forbs would create a vegetative community that is rare or lacking elsewhere within the region with the exception of the Refuge. This would not only benefit wildlife and the adjacent Refuge, but also provide the local community with passive recreation opportunities such as bird watching and hiking.