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Sent: 2/9/2018 9:42:37 PM
To: Kaur, Supinderjit [Kaur.Supinderjit@epa.gov]
Subject: Rolling Knolls - Draft Feasibility Study Report (December 2017)

Hi Supinder. I'll be out of the office all of next week, so I wanted to get at least these draft comments out to you. I'll put these in a formal letter when I get back from vacation. In the meantime, below please find DEP's preliminary comments on the December 2017 Draft Feasibility Study Report.

Comments

1. Information and data in the FS are presumed to be accurate as presented.
2. General Comment – The Draft FS Report needs revision to reflect responses provided to Agency comments on the Remedial Investigation Report and the Development of Alternative Remediation Standards (ARSs). For example, it was requested that the statement on page 19 of the Draft FS Report, third paragraph, "Risks are unlikely however, since tadpoles were abundant at many of the sampling locations" be deleted. Also, on page 4 of Appendix A of the Draft FS Report, the 84 days per year exposure frequency for trespassers was requested to be revised to 91 days per year (USEPA 01/17/2018 comments). One more example is the 4th paragraph on page 6 of Appendix A; "NRDCSRS" should be "RDCSRS".
3. Page 4, Section 2.3, "Site Ownership" – The statement "A small area at the northern end of the Surface Debris Area, approximately 4,000 square feet but not surveyed, extends onto a private/residential property" is of concern to the New Jersey Department of Environmental Protection (NJDEP or "the Department"). The existence of this privately-owned residential property is new information to NJDEP and this area needs to be addressed separately and remediated to unrestricted-use soil remediation standards according to N.J.A.C. 7:26E.
4. Page 24, Section 4.0, "Remedial Action Objectives and Preliminary Remediation Goals" – The fourth paragraph states "Because future use at the Site will not include residential development, risks associated with the Future On-Site Residential Development Exposure Scenario in the BHHRA were not considered in this analysis." Geosyntec is advised that the Deed Notice for the Site must clearly indicate all land uses that are restricted under the selected remedial action conditions, taking into consideration the 10E-06 excess lifetime cancer risk criterion, and other pertinent NJDEP requirements.
5. Page 24, Section 4.0, "Remedial Action Objectives and Preliminary Remediation Goals" – The third paragraph says that use of the property by landscapers will cease due to the institutional controls that will be placed on the Site. It appears that future uses of the Site will not be restricted just to trespassers since in the Draft FS Report there is mention of hunters using portions of the Site during hunting season (page 15) and continued use of an area of the Site by landscapers as a laydown or storage area. These inconsistencies in the understanding of potential future exposure scenarios are unacceptable and may invalidate the proposed ARSs.
6. The FS notes the USEPA range of acceptable Human Health risks is 1×10^{-6} to 1×10^{-4} . To reiterate and for the record, 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 (1×10^{-6}) and above an HQ of 1 are addressed either by remediation or institutional/engineering controls. Also see comment 4 above.

- Jill