

**U.S. ENVIRONMENTAL PROTECTION AGENCY
INITIAL POLLUTION REPORT**

I. Heading

DATE: October 12, 2004

SUBJECT: Crown Vantage Landfill Site
Alexandria Twp., Hunterdon County, New Jersey

FROM: Nick Magriples / Louis DiGuardia, On-Scene Coordinators *N. Magriples*
U.S. EPA, Region II
Emergency and Remedial Response Division

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POLREP NUMBER: 1 (Initial)

II Background

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| Site Number: | UF |
| Delivery Order Number: | EP-W-04-054-0003 |
| Response Authority: | CERCLA |
| CERCLIS Number: | NJN000204492 |
| NPL Status: | Proposed |
| State Notification: | NJDEP notified |
| Approval Status: | Verbal authorization from Deputy Division Director |
| Action Memorandum Status: | Pending |
| Start Date: | September 29, 2004 |

III. Site Information

A. Site Category

Abandoned landfill

B. Preliminary Assessment Results

The New Jersey Department of Environmental Protection (NJDEP) submitted a request for a removal assessment at the Crown Vantage Landfill Site (Site) on June 25, 2003. The Site is an abandoned, inactive landfill located off of Milford-Frenchtown Road in Alexandria Township, Hunterdon County, New Jersey. The ten-acre landfill has an estimated 1,500 feet of frontage directly on the eastern shore of the Delaware River and is an estimated 400 feet at its greatest width.

The landfill accepted various types of wastes from a nearby paper company for approximately 40 years, beginning in the late 1930s. It is reported that fly ash, cinders, and bottom ash from the paper mill's coal burning steam plant; household trash and construction debris, including concrete, roofing shingles, metal ductwork, household appliances, 55-gallon fuel drums, and plastic blocks; metal foil; off-specification paper; wastewater treatment plant sludge; paper fiber sludge; and 55-gallon drums of solvents and other organic/inorganic wastes were deposited in the landfill while it was in operation. The fill material in the landfill is approximately 20 to 25 feet thick at its maximum and forms a steep slope along its western edge. The majority of the fill appears to be flyash with badly degrading drums and debris mixed in.

During the early 1990s, the former owner of the property, James River Paper Corp., conducted a preliminary investigation at the Site which included removal and disposal of surficial containers and waste material. Sampling of the various waste streams identified: benzene, toluene, ethylbenzene, xylenes, acetone, methyl isobutyl ketone, methylene chloride, 1,2-dichloroethene, trichloroethene, styrene, carbon disulfide, and 4-methyl-2-pentanone. A soil gas survey identified tetrachloroethene, 1,1,1-trichloroethane, trichloroethene, benzene, toluene, and xylenes in the landfill soils.

Prior to the request for a removal assessment, the NJDEP had conducted a limited investigation at the Site during the period mid-2002 through mid-2003. It included the excavation of test pits, the removal and disposal of waste material and containers discovered at the surface and in the subsurface (including along the landfill face and toe), collection and analysis of surface soil samples, and a radiation survey. A total of 99 drums were excavated and overpacked, 46 of which were found to contain some portion of liquid. A majority of these drums were found to contain elevated organic vapors and the majority were determined to be either RCRA-characteristic ignitable and/or toxic. Benzene, 2-butanone, tetrachloroethene, trichloroethylene, and heptachlor were some of the analytical compounds identified at elevated levels. The NJDEP also installed a fence

around the Site, however due to the river's impact, most of the portion along the river has either been destroyed and/or removed.

A Removal Site Evaluation (RSE) was completed by EPA on May 25, 2004. The RSE concluded that the western face of the landfill, situated adjacent to the Delaware River, was being impacted by the scouring effects of the river. It stated that the rising water levels in the river over the past year had increased the contact time with the uncapped landfill face. Drums and other waste materials along the western face of the landfill were exposed and posed the potential for a release. Future releases of drums, waste material, flyash, and contaminated soils would continue unabated to the Delaware River should conditions remain unmitigated. During the past two years there were several months where the Delaware River's monthly average flow rates were up to 600% above normal. According to the RSE, if these hydrologic conditions continued, the releases could potentially increase as the landfill face was further eroded.

C. Situation

The Site is situated adjacent to the northernmost section of the Delaware-Rewritten Canal State Park, a popular recreational area. The Delaware River itself is used for fishing, kayaking, and boating. The topography of the Site is gently sloping except for an estimated 25-foot drop along the river. Based on flood plain data, the entire Site is situated within the 50-year flood plain of the Delaware River. A 10-year flood would inundate most of the western face of the landfill.

On September 20, 2004 the OSC conducted a site visit after the remnants of Hurricane Ivan resulted in the Delaware River rising well above flood stage. It was noted that the river had earlier crested above the face of the landfill. While observing an area of the landfill face that appeared to have experienced some erosion due to the flood waters, a portion of the landfill sloughed off into the Delaware River. The material was a black ash that had been sampled in November 2003 by EPA and revealed the presence of elevated levels of polyaromatic hydrocarbons (PAHs), heavy metals, PCBs and pesticides. The release into the river resulted in a black plume that hugged the landfill due to the force of the river and appeared to settle out the further downstream along the landfill that it proceeded.

A site visit on September 21, 2004 revealed that the Delaware River's water level had dropped almost ten feet. The full extent of the release noted on the previous day became more evident. It is estimated that at least 100 cubic yards of the black ash was released in this one area. As the water level subsided over the next two weeks, and the entire face of the landfill became accessible and visible from the pathway that runs between the river and the toe of the landfill, additional areas were noted that had suffered significant sloughing and/or damage.

IV RESPONSE INFORMATION

A. Status of Actions

Verbal authorization to initiate an emergency CERCLA Removal Action was received from the Deputy Division Director on September 23, 2004. On September 29th, the OSCs, a representative from the U.S. Coast Guard, and the Emergency and Rapid Response Services (ERRS) contractor (WRS Infrastructure and Environment, Inc.) response and program managers visited the site to discuss the scope of work and inspect the Site. At that time, a significant portion of the pathway that runs between the river and the toe of the landfill remained inundated. The ERRS contractor subsequently mobilized to the Site on October 4th.

Actions taken to date as of October 8th include: grubbing and clearing of vegetation within the existing fenced area, just inside the main gate, for establishment of a support zone; placement of fabric and stone in the support area; establishment of a contaminant reduction zone (CRZ) and placement of an office trailer; initiation of effort to collect waste materials (drums, drum carcasses and fragments, miscellaneous containers, slag, and rolls of waste paper and foil products) that have been released from the landfill face along the Delaware River; establishment of staging areas within the exclusion zone for this waste material; and initiation of the placement of fabric and stone on the interior site pathway that will be used to access the face of the landfill. The Coast Guard is present at the Site to assist the OSC with site health and safety.

The Public Affairs Division has been briefed on the emergency removal activities at the site. Notifications have been made to the appropriate Congressmen, local officials for both Alexandria Township and Milford Borough, the NJDEP, and the Delaware River Basin Commission.

B. Next Steps

Continue laying stone on the existing interior site pathway, as needed, to access the landfill face. Some trees and vegetation may need to be cleared to facilitate access along the pathway and prevent uprooting of trees whose roots have been exposed in the area of the collapse. Also expect the need to establish a decontamination pad for heavy equipment and arrange for disposal of material that may be generated in preparing the area for stabilization. Rip-rap will be placed in areas along the landfill face that have suffered significant sloughing and/or damage.

C. Key Issues

This limited emergency stabilization action is only addressing specific areas along the landfill face that were severely impacted by the recent flooding. The landfill face is uncapped and consists of waste material, contaminated soils, and debris. Scouring and erosion of the landfill face takes place each time the Delaware River rises and comes into contact with it. These occurrences result in releases of CERCLA-designated hazardous

substances into the Delaware River. Additional removal actions are warranted at the Site, as outlined in the RSE, after the emergency stabilization action has been completed. The entire landfill face needs to be addressed in order to eliminate the potential for further damage and to prevent future releases into the river.

V. COST INFORMATION

None available at this time.