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March 26, 1986

Mr. Ed Kaup
 Hazardous Site Mitigation
 Administration
 Division of Waste Management
 New Jersey Department of
 Environmental Protection
 Trenton, New Jersey 08625

Re: Comments on Draft RI/FS Report, Combe Fill South Landfill

Dear Mr. Kaup:

This letter documents EPA's comments on the draft remedial investigation report for the Combe Fill South Landfill. Nearly all of the issues addressed here have already been raised in previous discussions, notably the March 20, 1986 meeting in Edison. Our comments deal with: complete itemization of alternatives, alternate water supplies, wastewater treatment, RCRA cap approval criteria, the use of computer models to evaluate various cap designs, the effects of remediation on Trout Brook and the wetlands area south west of the site, radioactivity in soils and groundwater, partial excavation, and the nature of the bidirectional groundwater flow.

Because the final alternative selected may well be developed by combining features from two or more of those presented in the RI report, all alternatives must be fully itemized and costed out to facilitate manipulation of the various components. A matrix of components versus alternatives would clearly show any variation in costs for a given component across the range of suggested alternatives, as consolidation of work may be possible in some cases.

Alternate water supplies are of prime importance and may well be the focus of a specific Feasibility Study and Record of Decision for the first Operable Unit. As you know, the Division of Water Resources has already declared that the well water supplying three local residences is unfit for human consumption, and that the State will pay for temporary bottled water and an eventual hookup to the municipal supply.

ERRD-NJIRAS-NNJIRAS-KSTODDARD:m1:3/26/86 CONCURRENCES

SYMBOL	NNJIRAS	NNJIRAS						
SURNAME	STODDARD	CZAPOR						
DATE	3/26	3/26						

Four potential water supplies are addressed in the RI report: Peapack-Gladstone Water Department (Chester Township), Chester Water Company (Chester Borough), Washington Township Municipal Utility Authority (Washington Township), and the Morris County/Alamatonig water system (Randolph Township). These sources range from one to five miles from the site, as listed in the text. However, distances from the affected residences should also be included--to the nearest 0.1 mile--for costing purposes. The Alamatonig well field costs need to be updated for comparison. Also, each of these sources needs to be discussed in terms of the known groundwater flow, especially the WTMUA facility. In particular, are any of the existing supplies in danger of being contaminated?

A figure should be included to show both the four main water supplies and their service areas (within about five miles of the site) to show distribution of the residences on private wells versus those using common supplies.

The nearest POTW to the site, at Schooley Mountain, is currently operating at 0.33 MGD but has a design capacity of 0.5 MGD. Since the average site discharge is estimated to be about 0.135 MGD, the possibility of expanding this facility to accommodate the added effluent should be discussed in more detail.

Several cap designs are presented in the report, all of which presumably attain the applicable RCRA requirements. The RCRA criteria are based on both performance (i.e., no more than 10^{-7} permeability) and design to ensure such performance (e.g., use of liners and clay layers). However, since the basic cost of a standard RCRA-approved cap is fairly well-established, it may not be necessary to delineate design variations in suggested alternatives in the RI/FS phase. The optimum design can be addressed and developed during the RD phase. Again, the HELP model has proven to be a useful and cost-effective analytical tool and should be run to obtain basic information on expected cap performance.

Any of the alternatives proposed would effectively destroy Trout Brook and severely impact the southwestern wetlands just offsite. Although the headwaters of the brook are largely within the site boundaries and much of the wetlands has been filled by disposal operations, this aspect should be addressed more explicitly and any projected impacts explored, along with possible mitigation measures.

The high alpha and beta radiation levels measured at station S-3 ("Station 4") in 1981 may indicate disposal of radioactive wastes at the Combe Fill South site. Two added possibilities should be addressed: radiation sources for smoke detectors and cathode

tubes manufactured by the utility industry. Examination of the alpha/beta ratios by DEQ and ORP personnel should reveal the source of these elevated emissions.

The EPA has been criticized on several recent occasions for not considering the feasibility of partial excavation at this site to alleviate the hazard imposed by "hot spots" in the landfill material. The report should emphasize that the wastes onsite are both highly heterogeneous and noticeably lacking in 'hazardous substances' as defined by EPA. As such, no "hot spots" have been discovered to date, nor are they expected to exist. This situation removes the need for partial excavation, which serves to remove concentrated areas of hazardous materials.

The northwest-southwest groundwater division indicated on Plate 7 is of considerable importance, as it approximates the northeastern border of the site. Accordingly, the groundwater moving to the northeast may carry contaminants with it. We should consider the feasibility of installing additional monitoring wells along this border to define the division more accurately. However, we also feel that the available data are adequate to proceed with the FS.

If you have any questions on our comments, please contact Kirk Stoddard at (212) 264-7604.

Sincerely yours,

John V. Czapor, Chief
Northern New Jersey Remedial Action Section



State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WASTE MANAGEMENT
HAZARDOUS SITE MITIGATION ADMINISTRATION
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ADMINISTRATOR

18 MAR 1986

M E M O R A N D U M

TO: Distribution

FROM: E. G. Kaup, Site Manager
Bureau of Site Management

SUBJECT: Combe Fill South Landfill (CFS)
Final Selection of Alternative Remedials

Meeting of NJDEP and EPA representatives with RI/FS contractor, Lawler, Matusky & Skelly Engineer, to give guidance for the preparation of CFS Task #5, Evaluation of Alternatives. Screening Alternatives attached herewith.

Place: Conference Room (Red)
EPA Region 2 Facility
Edison, NJ

Date: March 20, 1986

Time: 12:30 p.m.

Distribution:
Contractor - Lawler, Matusky and Skelly
Dr. Marwan M. Sadat, DWM
Dr. Jorge H. Berkowitz, HSMA
K. Goldstein, DWR
Robert Myers, BEERA
William O'Sullivan, DEQ
Len Romino, BSM
Kurt Stoddard, EPA II (w/o attachment)
Dan Toder, DWR
Eric Evenson, DWR
Janice Haveson, OCR
Robert Predale, BSM
John Czapor, EPA II (w/o attachment)
David Kindig, BSM

HS102:jb

Attachment

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