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APR 28 1986

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21 April 1986
File No. 455-102

Mr. Edgar Kaup **28 APR 1986**
NJ Department of Environmental Protection
Division of Waste Management
Hazardous Site Mitigation Administration
428 East State Street
Trenton, New Jersey 08625

Re: Combe Fill South Landfill RI/FS
Comments on Preliminary (RI) Report and Screening of
Alternatives

Dear Mr. Kaup:

The attached table briefly summarizes our responses to comments from the NJDEP and EPA Region II, forwarded by you in your correspondence of 14 April 1986, on our Preliminary Remedial Investigation Report and our memoranda on the screening of alternatives. We have already discussed our responses with you during our telephone conversation of 17 April 1986.

We expect the Final Remedial Investigation Report to be completed and sent to you during the first week of May 1986.

If you have any questions, please call.

Very truly yours,

Ruth M. Maikish
Ruth M. Maikish

RMM:gmk

Attachment

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TABLE 1

SUMMARY OF RESPONSES TO COMMENTS FROM NJDEP AND EPA
PRELIMINARY REMEDIAL INVESTIGATION REPORT AND ALTERNATIVES

<u>Commentor and Comments</u>	<u>LMS Response/Action</u>
A. <u>E. Kaup (HSMA of NJDEP) - 14 April</u>	
1. Numerical identification of residents to replace names	1. Changes already underway as noted in correspondences of 26 March and 7 April 1986.
2. Clarification of ground-water flow and contaminant movement	2. Text will be clarified.
3. Corroboration of literature values of permeability as applicable to site.	3. Additional detail will be provided in text.
B. <u>R. Yeates (DEQ of NJDEP) - 2 April 1986</u>	
1. Questionable suitability of passive gas venting as remedial technology	1. Is LMS to interpret this remark as an elimination of passive venting for detailed evaluation? Passive venting is currently one of the technologies being examined in detail in Task 5. LMS thinks it has merit to be included.
2. Problem of emissions from air stripper	2. Temporary small-scale, air stripping is no longer being considered for detailed evaluation in Task 5. This possible fast-track action has been replaced with the development of a permanent alternate water supply.

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TABLE 1 (continued)

<u>Commentor and Comments</u>	<u>LMS Response/Action</u>
C. <u>Yeates, R. and J. Held (DEQ of NJDEP) - 26 March 1986</u>	
1. High zinc in filter blanks	1. Text will explain problems of filter contamination and how data adjusted accordingly.
2. Conclusions re: off-site migration of contaminants	2. Conclusions as stated in comment are not made in text. Worst-case scenario was not attempted. Text concludes only that limited data shows <u>no significant</u> air migration of contaminants.
3. Air quality modeling	3. Receptors within 0.5 ^{miles} are assumed to experience almost identical concentrations of contaminants as receptors at the 0.5 mile boundary. Model used emission from landfill only; background concentrations were subtracted before model run. Choice of Wilkes Barre/Scranton is explained in Appendix A.
4. Use of capping and controlled venting as remedial actions	4. These actions are included in Task 5 work.
5. General Comment numbers 1, 2 and 3	5. Corrections to text will be made as suggested in comment.
D. <u>B. Myers (BEERA of NJDEP) - 26 March 1986</u>	
1. Emphasize concerns about bedrock features	1. Will check text to see that emphasis is included.
2. Interpretation of contamination in Ram well	2. LMS stands by its interpretation. Landfill contamination is not minimized.
3. Groundwater flow	3. Same response as for E. Kaup comment no. 2.
4. Radioactivity	4. No LMS response necessary.
5. Risk assessment	5. Same as responses to J. Savrin comments.

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TABLE 1 (cont'd)

<u>Commentor and Comments</u>	<u>LMS Response/Action</u>
E. <u>D. Toder (DWR of NJDEP) -</u> <u>14 March 1986</u>	
1. Feasibility study	1. Feasibility study is separate report
2. Groundwater flow and contaminant movement	2. Same response as for E. Kaup comment no. 2.
3. Municipal water	3. A separate, concurrent study on the feasibility of supplying alternate water to the residents is expected to be underway shortly.
4. Flow calculation	4. Typographical error will be corrected.
F. <u>J. Czapor (EPA, Region II) -</u> <u>2 April 1986</u>	All of these comments deal with the analysis of alternatives. There were no comments on the Task 2 - RI Report specifically.
1. Page 1, third paragraph - Alternate water supply	1. Same response as for D. Toder comment no. 3.
2. Page 2, first paragraph - Issues important to water supply FS	2. Issues will be addressed in separate conceptual design of alternate water supplies.
3. Page 2, second paragraph - Water supply areas	3. LMS will show service areas on USGS maps if NJDEP furnishes water supply reports from necessary areas (i.e., Chester Township and Borough). LMS has Washington Township report.
4. Page 2, third paragraph - Off-site treatment	4. As per correspondence with NJDEP, off-site treatment will not be considered in detailed alternative evaluations in Task 5.

TABLE 1 (continued)

<u>Commentor and Comments</u>	<u>LMS Response/Action</u>
F. (cont'd)	
5. Page 2, fourth paragraph - Comments on capping	5. A cap with a membrane will not be considered in detail. Problems with membranes will be discussed. Although the general design of a multi-layered cap is fairly well established, costs may fluctuate considerably. The "clayless" cap described in LMS's screening of alternatives has greater permeability than the clay cap and will be evaluated in terms of its subsequent greater treatment needs. Our scope of work and budget do not allow utilization of HELP model; such work, if desired, must be requested as part of a contract amendment.
6. Page 2, fifth paragraph - Impacts to wetlands	6. Impacts to wetlands will be described in relation to alternative remedial designs. Detailed discussions of ecological ramifications are beyond the scope of work of the analyses of alternatives.
7. Page 3, second paragraph - Excavation	7. The heterogenous nature of the waste and lack of "hot spots" will be described in relation to the elimination of excavation as a remedial measure except as a part of site grading.

TABLE 1 (continued)

<u>Commentor and Comments</u>	<u>LMS Response/Action</u>
G. <u>J. Savrin (BEERA/ETRA of NJDEP) - 3 April 1986</u>	In our meeting with the BEERA and HSMA staff of 16 December 1985 and our subsequent meeting memo of 20 December 1985, we emphasized that Risk Assessment was not within our scope-of-work. However, since we understood that such evaluations are becoming important tools in site evaluation, we agreed to address the spirit and intent of risk assessment guidance. Guidance provided by BEERA was used as such and was not to be assumed to be requirement as implied in these comments. We believe our chapter has provided the NJDEP with sufficient information to guide the course of the FS. The conclusions of the RI will not change should the risk assessment be refined: the site must be remediated, particularly the groundwater. We cannot respond to additional requests without a contract amendment and additional budget allocations. We have already gone over budget in our attempts to comply to such requests to date. In light of this, we will address only the following specific comments:
1. Page 3, Comments No. 1 and 2 on identification of populations	Section 2.1 and Table 2-1 of report will be referenced in Chapter 8.
2. Page 3, Comment 2 on estimation of concentrations	In the second line on page 8-8 the word "or" will be replaced for the word "plus."