

6. An additional goal of the ground water investigation should be to determine the a real and vertical extent of ground water contamination.
7. Previous sampling results have indicated that portions of Trout Brook and Rhinehart Brook are contaminated. However, if future sampling results of Trout Brook downstream show no evidence contamination it would not be necessary to sample the Lamington River.
8. As a source control measure the RAMP indicates that it would be infeasible to undertake a large waste removal operation. However, if small areas of hazardous wastes are identified away from the main fill areas excavation and removal may be required.
9. As part of the drilling program it is proposed that 4" rock core/monitor wells should be relocated to improve ground water monitoring coverage of the site perimeter. Since fracture patterns in the bedrock are so complex and ground water contamination may move in several directions off-site, a larger number of wells monitoring ground water at the site perimeter would be more advantageous.

Another alternative may be to use these four well locations to monitor ground water off-site. Presently, there is only one well proposed off-site. Rock coring, however, would be done in four of the on-site wells. If the above alternatives are implemented for relocating the four rock core/monitor wells, the additional wells the RAMP proposes in the Phase II drilling program may not be needed. Fracture trace analysis should be used to help select monitoring well locations.

10. In the first paragraph under Phase I "Drilling and Monitoring Wells" the RAMP states split barrel soil samples will be performed in soft zones between rock fragments. If odors are noticed or organic vapors are detected by a photoionization detector, the split spoon samples should be analyzed for organic chemical contamination. Split spoon sampling probably will be difficult in most areas of the site, however, marsh areas will be suitable for split spoon sampling and test pit excavation.
11. The RAMP recommends that 20 test pits will be necessary. It is our feeling that ten test pits would be sufficient. If extensive amounts of wastes are detected in the unfilled portions of the site additional test pits will be considered.
12. An additional off-site remedial measure should include installing deeper wells (200-300 ft.). These wells may be cost effective when compared to individual carbon treatment units since carbon replacement would not be necessary.
13. Air quality sampling locations should be added to the objectives identified for site reconnaissance.
14. The RAMP states that "Air monitoring samples would be taken in areas identified as containing organic air contaminants during a site reconnaissance." It is our feeling that a more extensive air sampling program is required at this site therefore this statement must be amended in order not to limit the overall air sampling program.

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15. The RAMP indicates that the landfill is bordered on the west-southwest by a wetland area. This wetland area actually extends onto the landfill site. It should be noted in the RAMP that disturbance of this area may require a 404 permit from the Army Corps.
16. The streams in the vicinity of the landfill have been incorrectly identified in the RAMP. Rhinehart Brook is not a tributary of Trout Brook. It is a separate stream which runs east-northeast from the landfill, crossing Schoolhouse Lane (see enclosed map).

Should you have any questions regarding this site, please contact Mr. Donald Lynch, P.E. at (609) 984-5923.

Sincerely yours,

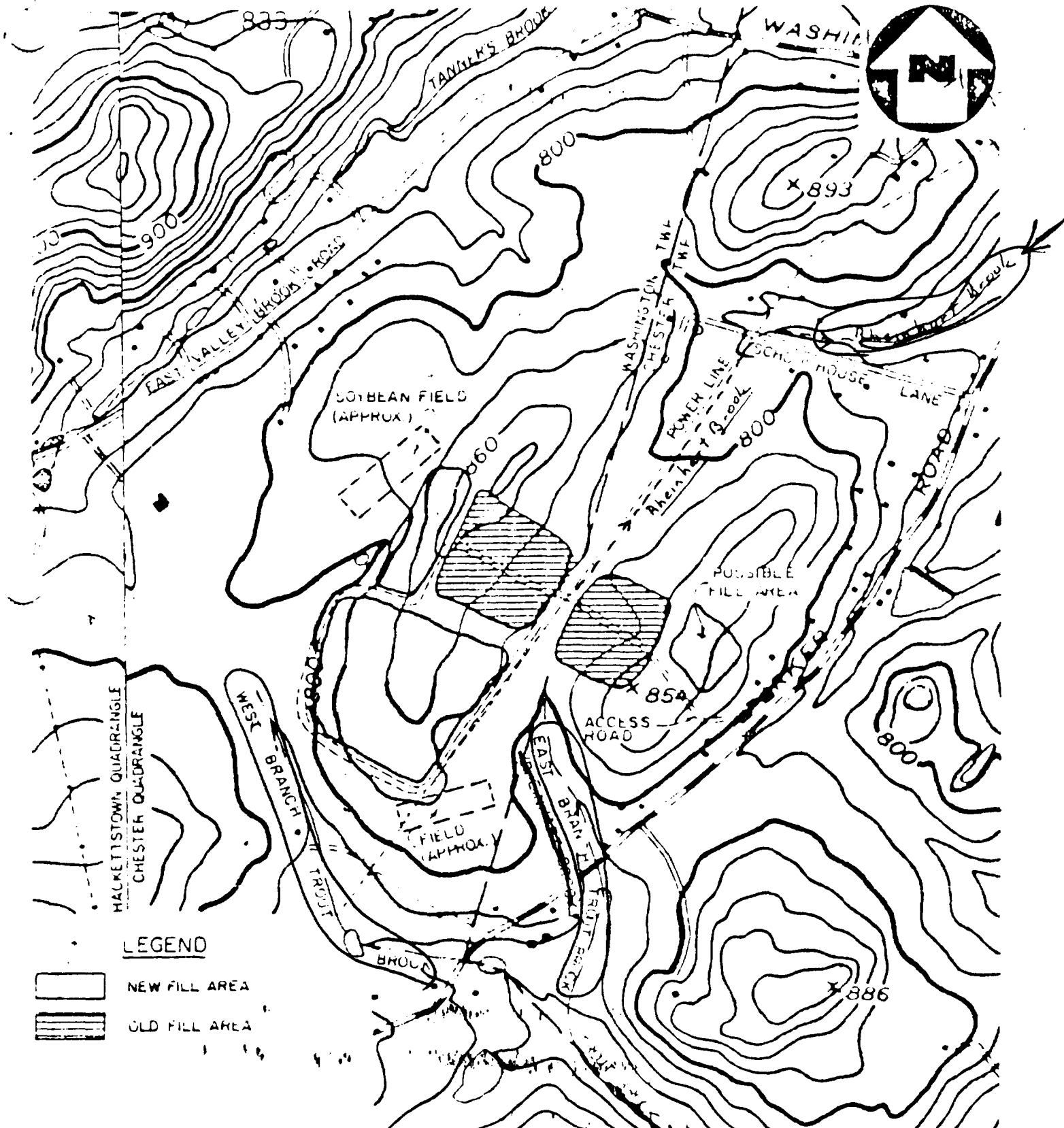


Leonard Romino, P.E.
Section Chief
Bureau of Site Management

HS39:elw
Enclosure

cc: Robert Goltz, EPA

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LEGEND

- NEW FILL AREA
- OLD FILL AREA

BASE MAP IS AN ENLARGEMENT OF A PORTION OF THE USGS CHESTER, NJ QUADRANGLE (7.5 MINUTE SERIES, 1954, PHOTO-REVISED 1981, CONTOUR INTERVAL 20') AND THE HACKETTSTOWN, NJ QUADRANGLE (7.5 MINUTE SERIES, 1953, PHOTO-REVISED 1971, CONTOUR INTERVAL 20')

APPROXIMATE SITE LAYOUT
COMBE FILL SOUTH SITE
WASHINGTON & CHESTER TOWNSHIPS, NJ

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FIGURE 2-2

