MARWAN M. SADAT ADMINISTRATOR



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF WASTE MANAGEMENT
HAZARDOUS SITE MITIGATION ADMINISTRATION
CN 028, Trenton, N.J. 08625

JACK STANTON DIRECTOR

19 OCT 1983

Mr. John Frisco, Chief Hazard Remediation Section Hazardous Waste Site Branch USEPA - Region II 26 Federal Plaza New York, New York 10278

Dear Mr. Frisco,

Our office has completed its review of the Draft Combe Fill South Landfill Remedial Action Master Plan (RAMP). Please note our comments on this document listed below. These comments, as well as other incidental remarks, were discussed in a recent meetings between Mr. Robert Goltz of your staff and Mr. Donald Lynch of my staff on October 6, 1983.

- 1. Recent inspections and sampling performed by DEP staff along Parker Road indicate that small business may be contributing to the ground water contamination problem in this vicinity. Therefore, these small business should be considered when locating possible sources of contamination during the remedial investigation.
- 2. Please explain how the total organics were calculated in Table 4-4. When all identified organics are added they do not equal the total organics expressed in the appropriate table.
- 3. The RAMP mentions inconsistencies in surface water sampling results in the landfill vicinity (see pg. 4-17). It should be noted that the samples taken by the Upper Raritan Watershed and DEP were not split samples. These samples were taken at different times and locations so variations in sampling results are expected.
- 4. With regard to sampling residential potable wells it is recommended that all data on these wells (depth of well, accessibility to the well, pump capacity, etc.) should be obtained prior to sampling. Furthermore, sampling 20-25 residential wells, as opposed to 80 recommended in the RAMP, should provide sufficient information on ground water quality in the area. Wherever possible these wells should be used to determine ground water flow.
- An additional goal of the geophysical investigation should be to located areas of ground water contamination.

600086

- 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.

- 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,

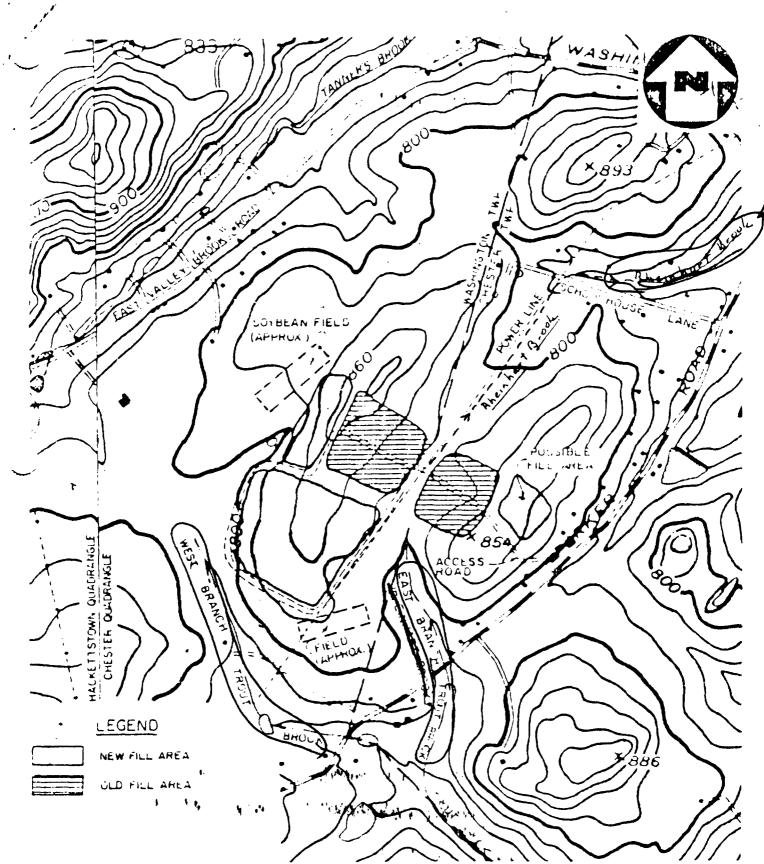
Leonard Romino, P.E.

Section Chief

Bureau of Site Management

HS39:elw Enclosure

cc: Robert Goltz, EPA



MASE MAP IS AN ENLARGEMENT OF A PORTION OF THE UIDIGIS CHESTER, NU QUADRANGLE (7.5 MINUTE SERIES, 1954, PHOTO-REVISED 1981, CONTOUR INTERVAL 20') AND THE HACKETTS TOWN, NU QUADRANGLE (7.5 MINUTE SERIES, 1953, PHOTOREVI-SED 1971, CONTOUR INTERVAL 20').

APPROXIMATE SITE L'AYOUT

COMBE FILL SOUTH SITE

WASHINGTON & CHESTER TOWNSHIPS, NJ

600089

FIGURE 2-2

