

Alison Hess



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May 21, 2014

Ms. Alison Hess
Remedial Project Manager
U.S. Environmental Protection Agency
290 Broadway, 19th Floor
New York, NY 10007

RE: Semi-Annual Progress Report
Crown Vantage Landfill
Alexandria Township, Hunterdon County, New Jersey
TRC Project No. 164117.000170.000040

Dear Ms. Hess:

This semi-annual progress report regarding the operation and maintenance of the Remedial Action at the Crown Vantage Landfill site (the site) has been prepared in accordance with Paragraph 29 of the Consent Decree (CD) between you and the Settling Defendants, International Paper (IP) and Georgia-Pacific Consumer Products, LP (GPCP). This report addresses progress since the last monthly progress report, which was submitted on November 27, 2013.

Actions Taken since the Previous Progress Report (November 27, 2013 to present) to Comply with CD

The following actions were taken since the last progress report to comply with the CD:

- On December 20 and 31, 2013 and January 6, 2014, Land N Sea Environmental Services under contract to TRC Environmental Corporation conducted the following activities, which were identified on the basis of the October 29, 2013 site inspection:
 - Rehabilitated the gate at the northwestern end of the stabilization wall that provides access to the river's edge. Existing vegetation had made the gate impossible to move. Vegetation was removed, thereby allowing the gate to move freely. The gate was then locked with a padlock keyed to match the other gate padlocks on site.
 - Larger woody vegetation growing along the face of the stabilization wall, along the drainage swale at the top of the stabilization wall, and immediately in front of the southernmost large sign at the top of the wall was cut back and removed.
 - Dead vegetation was removed from the fence line in the southern corner of the site (vegetation that was killed by herbicide application earlier in 2013).

A padlock was also added to the main gate to allow emergency responders to access the site in the event of an emergency.

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- On January 16, 2014, an application was filed with the Somerset County Superior Court for the appointment of a receiver relative to the establishment of a deed notice and continued site access relative to continued inspections and maintenance of the site.
- On February 14, 2014, the Superior Court of New Jersey signed the order regarding the appointment of a receiver for the establishment of a deed notice and continued site access.
- On February 25, 2014, the Deed Notice for the site was recorded by the Hunterdon County Clerk. A copy of the recorded notice was provided to the EPA on March 11, 2014.
- On April 10, 2014, keys to the main gate padlock were mailed to the Fire Chief of the Milford Fire Company and to the Kingwood Station of the New Jersey State Police, to provide them a means of access to the site in the case of an emergency. A copy of the recorded Deed Notice was also provided to each party.
- On April 11, 2014, IP submitted a formal request for a certificate of completion for the remedial action at the site.
- On April 22, 2014, the semi-annual site inspection was conducted, in accordance with the procedures described in the Remedial Action Work Plan.

Summary Sampling, Test Results, and Other Data Received or Generated since last Progress Report

None.

Plans, Reports and Other Deliverables Required by CD Completed and Submitted since last Progress Report

The deed notice for the site was recorded by the Hunterdon County Clerk on February 25, 2014. A copy of the recorded notice was provided to the EPA on March 11, 2014.

Work Planned for Next Year

The semi-annual site inspection was conducted on April 22, 2014. Maintenance activities conducted since the last site inspection were confirmed. Namely, an existing gate at the northwestern end of the site that provides access to the base of the stabilization wall was rehabilitated since the last inspection, thereby allowing inspection of the stabilization wall from the river's edge. Also, vegetation that blocked the view from the river of the southernmost large site identification sign located at the top of the stabilization wall was cut back and dead vegetation was removed from the fence line along the southern end of the site (vegetation killed during previous herbicide application in that area).

New observations made during the April 2014 site inspection included the identification of two areas along the eastern edge of the site where trees have fallen against the perimeter fence line. A large log was identified along the top surface of the stabilization wall. Also, woody vegetation, consisting of young saplings, was identified at sporadic locations along the stabilization wall.

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Actions to be taken as a result of the April 2014 semi-annual inspection include the removal of the fallen trees from the fence line, the removal of the log from the top of the stabilization wall, the removal of previously cut vegetation from the top surface of the stabilization wall and the removal of young saplings via hand pulling and/or the use of a come-along. Due to the small size of the saplings, this approach to sapling removal should not have an adverse impact on the stabilization wall and is more environmentally friendly than the use of herbicide.

Two semi-annual site inspections will be conducted in the coming year, one in fall 2014 and one in spring 2015, per the Remedial Action Work Plan. Site inspections will also be conducted after any flooding event that meets the criteria defined in the Remedial Action Work Plan. Site maintenance (e.g., repair of perimeter fencing or management of vegetation along site fencing and/or interior roadways) will be conducted as needed, pending observations made during the site inspections.

Estimated Percentage Completion of Work Required by the CD and Unresolved Delays

The remedial action work required by the CD is complete.

Modifications to Work Plans or Schedules

None.

Activities Undertaken and to be Undertaken in Support of Community Involvement Plan

A community meeting was held on January 27, 2014 and was attended by representatives of IP and GPCP. The next community meeting is scheduled for June 2, 2014.

We trust this meets your requirements at this time. If you have any questions or comments, please do not hesitate to contact me.

Sincerely,



Brian E. Jones

cc: Director, Emergency & Remedial Response Division, EPA
L. Vogel, New Jersey Department of Environmental Protection
P. Montney, Georgia-Pacific
J. Oliva, TRC