	Page	Section	Paragraph	Comment
General Comments				
1	General			The ARSs were developed as site-specific PRGs and would replace the applicable chemical-specific ARARs. For the evaluation of chemical specific ARARs for Alternatives 3, 4, and 5, provide a detailed discussion on how the PRGs would be met and how capping/excavating 25 acres, remediation of APCs, and vegetative covers would minimize exposure pathways.
Specific Comments				
1	xiii	ES	3	Revise sentence to clarify that SVOCs, pesticides and PCBS all exceeded NJGWQS.
2	xiv	ES	1st paragraph of the page	List the specific metals that pose potential ecological risks.
3	XV	ES		Why aren't the numerical values for the comparative analysis of alternatives as presented on page 81 and 108 used in the Executive Summary? The Executive Summary presents a table (pg. XV) with a range of narrative descriptors for comparison which don't seem to be replicated in the text of the document.
4	xvi	ES	3rd paragraph of the page	Please delete "(grasslands)" from the text.
5	3	2.2	3	Show location of the current Laydown Area on report figures
6	6	2.6	3	EPA has completed review of the RI and has finalized it. Please revise text accordingly.
7	10	2.7.3	2nd bullet on page 10/11	1,4-dioxane was above GWQS in MW-19 in 2016 sampling event. Please add MW-19 to the list of wells (MW-10 and MW-18) that exceeded the GWQS for 1,4-dioxane.
8	13	2.7.5.1	1	For hydrologic conditions, add discussion of culvert connecting large pond to wooded area. Show on figure.
9	30	4.2.1	2nd paragraph of the page	Soil results were compared to the NJDEP's IGWSSLs to identify areas where COCs in soil could migrate to and impact groundwater. Provide the comparison table.
10	32	4.3	1st paragraph	The text says that dioxin-like PCBs were determined to be the primary risk driver at the Site. Please change this to "dioxin-like PCBs were determined to be the primary risk driver at the Site, and the only risk drivers for human health for the trespasser scenario."

11	36	5.1	2nd paragraph	1. The text says, "Another consideration in the identification of general response actions is that 35 acres of the landfill are located within an environmentally sensitive area within the GSNWR." However, based on Figure D4-1 of the Final BERA, the majority of the 35 acres of landfill within GSNWR was low-value upland or wetland. A very small area was identified as potential Bog Turtle Habitat Area (Figure 6-1). Please define the meaning of "environmentally sensitive area" and show these environmentally sensitive areas on a figure referenced in Section 5.
12	47	6.2	1st paragraph	"Site controls reduce the long-term human health risks and prevent human exposure to contaminated soil by restricting land use and physical access." Change "prevent" to "minimize".
13	48	6.2.2	Under Chemical Specific ARARs	This paragraph confused the rating of "compliance with ARARs" with whether the alternative does or does not comply with chemical specific ARARs. Alternative 2 does not comply with chemical specific ARARs since the contaminant concentrations would remain the same at ground surface. Please revise the text accordingly.
14	49	6.2.5	First bullet	There are two "for protection", delete one.
15		6.3 and 6.4		Why weren't SS-47, SS-49, SS-50, SS-51, SS-53, SS-71, SS-72 and SS-75 included in the Selected Area to be capped or excavated? All have elevated levels of contamination and are less than 200 feet from the Selected Area. Significant additional risk reduction (both eco and human health) may be achieved.
16	52	6.3	Below the bullets	Add a note below the bullets with volume estimate to read "The volume requiring remediation would be determined based on PDI results."
17	56	6.3.1	Under bullet for Environmental Protection	The text stated that "small areas of potential habitat for the federally threatened and State endangered bog turtle and blue-spotted salamander, as well as mature trees that are potential roosting habitat for the federally threatened and State endangered Indiana bat, would be lost permanently." Provide a figure to show where the potential habitat for the threatened and endangered species listed are located to support this discussion. Figure 6-2 only showed the potential Bog Turtle Habitat Area next to SS-109 and TP-09.
18	57	6.3.2	1st paragraph	Under Chemical Specific ARARs. The text stated, "Although contaminant concentrations are not necessarily reduced" by capping the Selected Area and

				remediating the APCs and the non-vegetated areas, the surface contaminant concentrations would be reduced. Revise.
19	59	6.3.5	1st paragraph	Under Protection of Community during Remedial Actions, after the sentence for 22,500 to 26,700 truck trips over two to three years, add a sentence to read "Using on site material for backfill or capping to potentially reduce truck traffic would be evaluated during the remedial design". Also, add a sentence that if the remedial construction causes any damage to public road, the road will be repaired to the satisfaction of the township.
20	59	6.3.5	Second bullet	Under Environmental Impacts, it stated about destruction of approximately 3 to 7 acres of wetland. The area of wetland that would be remediated shown on Figure 6-2 appears to be less. Please verify. Also provide discussion on the value of wetland and how the wetland would be replaced.
21	Alternative 4			Please ensure comments regarding Alternative 3 that are applicable to Alternative 4 are be updated in the evaluation of Alternative 4.
22	70	6.4.6	First bullet	What are the reasons to anticipate an excavation to 4 feet under Alternative 4, but not under Alternative 3? Please include rationale for excavation of 4 feet.
23	72, 75, 77	6.5, 6.5.2, 6.5.5		No description or discussion was provided on potential impacts and/or loss of flood control capacity with this alternative. How will the impacts be mitigated? Seems like this is the determining factor for this alternative. Discussion should be provided. Also discuss how location specific ARARs for wetland would be met.
24	81	6.6		Total score should exclude ranking of cost.
25	82	6.6.1	3rd paragraph	Alternative 5 provides higher risk reduction than Alternatives 3 and 4. Please revise.
26	83	6.6.2		Provide more detailed evaluation on compliance with flood control issues and wetland restoration. These two ARARs would be the most difficult to comply with under Alternative 5.
27	84, 85	6.6.5, 6.6.6		Remove the statements regarding increased risk to workers at excavations to 4 feet below ground surface from these two sections and other sections. This is a shallow excavation process and can be easily mitigated with sloping of side walls. Shoring will most likely not be needed.
28	87	7.2		Remove all evaluation statement from this section.

29	91	7.3		Since contamination at TP-09 has already impacted groundwater, and since it is a wetland, excavation and off-site disposal is the suitable remedy for soil contamination at TP-09. Capping alone would not be an effective remedy here. Additional in situ treatment after excavation may be necessary, which will be determined during PDI. Please add the following language "Contamination identified at TP-09 will be excavated at least to the water table and disposed of off-site. Confirmation sampling will be conducted post excavation." Please note that other APCs can be addressed via other methods once PDI work is completed.
30	102	7.4.4		Under Magnitude of Residual Risk, the text states that an impermeable cap could be placed on the source area to achieve source control since this measure would prevent infiltration of rainwater that could carry the contaminants down to the groundwater. However, there may be areas (like at the TP-09 area) where groundwater is very shallow and the source likely extends below the water table, so an impermeable cap would not stop contaminant migration. Please provide a discussion on where the wastes and contaminants are located vertically in comparison to groundwater. See specific comment 29 on Section 7.3 regarding appropriate remedies for groundwater source area(s).
31	108	7.5	Ranking table	Total score should exclude ranking of cost.
32	109	7.5.5		When discussing the contingency for Alternative 3 please include the following language "If the contingent remedy is required in Alternative 3" as described in the previous criteria evaluations.
33	111	7.5.8	2nd paragraph	Please remove "to be implemented if needed based on monitoring results" from the second sentence.
34	113	8	End of second paragraph	Please rephrase the last sentence to read "due to potential excavation depth increases."
35	Table 5-1			For the respective APCs, were there multiple COCs exceeding 3X the ARS values, or just those one listed COC listed in the second column? If there were multiple COCs, please include them in the table as well.
36	Tables 6-1 and 7-1			In tables 6-1 (comparative analysis of soil remedial alternatives) and 7-1 (comparative analysis of groundwater remedial alternatives), all evaluation criteria are evaluated and compared with the same numerical ranking of poor, moderate, good, and excellent. Threshold criteria and balancing criteria should

			not have the same categorization or comparison. Please make the following changes to the tables:
			
			• For threshold criteria, change the grading to either "meets NCP criterion" or "does not meet NCP criterion". The alternatives either comply with protection of human health and environment and compliance with ARARs or do not meet them. These criteria should not be described as poor, excellent, or somewhere in-between.
			• Instead of using the numerical ranking mentioned above, for all balancing criteria except cost, change grading to the following (including the descriptions in the notes):
			  ○ Poor – alternative is expected to perform poorly against criterion
			  ○ Moderate - alternative is expected to perform moderately well against criterion
			  ○ High – alternative is expected to perform very well against criterion
			• For cost balancing criteria, remove any grading or classification. Only keep the dollar amount value/total cost in these tables.
			• Include a row for each alternative that states the approximate time it would take to achieve the RAOs
			
			In addition to the comparative analysis tables for the soil and groundwater alternatives, please include detailed tables in the FS that describe and summarize how the respective alternatives rank against evaluation criteria from Section 6 and 7.

37	Table 6-1		The 4 ranking for location- and action-specific ARARs for Alternative 2 are incorrect when the text ranked these two criteria as poor. Please revise accordingly.
38	Table 6-2		Please remove the groundwater chemical specific ARARs from this table as this table is for the soil remedy.
39	Table 7-2		Both Federal and NJ MCLs are relevant and appropriate requirements.
40	Figure 5-2 Legend		Delete "excavated" and replace with "capped" (artifact from previous draft FS)

41	Appendix C		The discussion of the soil and soil invertebrate sampling that are within the 25-acre "Selected Area" indicates where the tabular data can be found. It may be useful to include further information regarding the soil invertebrates and the uncertainty associated with assuming that their concentrations are equal to the reporting limits.
42	Appendix C		The evaluation of the American robin hazard quotients for cadmium, cyanide and selenium should include a discussion of reference hazard quotients for consistency with the other contaminants. Additionally, for the short-tailed shrew, information regarding reference hazard quotients should be included for cadmium and selenium.
43	Appendix C		The hazard quotient associated with methylmercury risk to the American robin was calculated to be greater than one. Further information regarding the methylmercury toxicity reference values that are available may be helpful.
44	Appendix C		The discussion of the short-tailed shrew hazard quotient values includes information regarding cadmium, chromium, lead, and selenium. However, it is unclear why barium and PCDD/F were not included in this discussion.