Geosyntec consultants

1750 American Boulevard
Suite 200
Pennington, NJ 08534
PH 609.895.1400
www.geosyntec.com

8 September 2022

Ms. Rupika Ketu
Remedial Project Manager
United States Environmental Protection Agency, Region 2
New Jersey Remediation Branch
290 Broadway, 19th Floor
New York, New York 10007-1866

Subject: Response to USEPA Letter of August 25, 2022
Rolling Knolls Landfill Superfund Site
Chatham, New Jersey

Dear Ms. Ketu:

On behalf of Chevron Environmental Management Company, (for itself and on behalf of Kewanee Industries Inc.,) Nokia of America Corporation (f/k/a Alcatel-Lucent USA Inc.), and Novartis Pharmaceuticals Corporation (the "Group"), please accept this letter as the Group's acknowledgment of and initial response to the August 25, 2022 letter from United States Environmental Protection Agency ("USEPA") regarding additional investigation activities at the Rolling Knolls Landfill Superfund Site in Chatham Township, New Jersey (the "Site") pursuant to the September 2005 Administrative Settlement Agreement and Order on Consent for Remedial Investigation and Feasibility Study ("ASAOC"), II-CERCLA-02-2005-2034. We must confess some degree of surprise at the letter because it had been our understanding from the meeting with USEPA on July 19, 2022, that USEPA would be discussing internally the issues raised at that meeting and that it would be meeting with us again before taking a formal position on next steps.

Nevertheless, the Group is prepared to move forward with a workplan in response to your August 25, 2022 letter. The Group believes that the investigation should be conducted in phases and that the workplan should be phased accordingly. Specifically, the Group proposes to prepare an initial workplan to address items (1), (2), and (3) of your letter. The Group has already undertaken a fair amount of work with respect to items (1) and (2).

The Group would then address whether and the extent to which to undertake the activities described in items (4) and (5) taking into account the results of the initial investigation and the regulatory status of PFAS. The Group requests an additional 30 days, to October 24, 2022, to submit the initial workplan.

Given that the United States Fish and Wildlife Service ("USFWS") owns a large portion of the Site and it, like the Group, is a Potentially Responsible Party, the Group concurs that USFWS' participation in the investigation will be essential. The Group appreciates USEPA sending USFWS a separate letter requesting its participation in these efforts.

In closing, the Group believes that a meeting among the parties in advance of the deadline for submitting the workplan would be helpful in assuring that all are in alignment with respect to the methodology and goals of this investigation.

Please contact me at 609.903.6227 if you have any questions.

Sincerely,

John L. Persico, P.G.
Principal

Copies:
Richard F. Ricci, Esq., Lowenstein Sandler, LLP
Rolling Knolls Group