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DEPARTMENT OF ENVIRONMENTAL PROTECTION  
Site Remediation and Waste Management Program  
DIVISION OF ENFORCEMENT, TECHNICAL & FINANCIAL SUPPORT  
BUREAU OF ENVIRONMENTAL EVALUATION AND RISK ASSESSMENT  
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Trenton, NJ 08625-0420  
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CATHERINE MCCABE  
Commissioner

SHEILA OLIVER  
Lt. Governor

May 17, 2019

Antoinette Kelly  
Village of Ridgewood Board of Education  
49 Cottage Place  
Ridgewood, NJ 07451

Re: Alternative Remedy/ Remedial Action Application  
Ridgewood Ash Landfill  
230 Demarest Street  
Ridgewood, NJ 07450  
SRP PI# G000008572

Dear Ms. Kelly,

The New Jersey Department of Environmental Protection (Department) has completed a review of the Alternative Remedy for the subject site, received in the Bureau of Environmental Evaluation and Risk Assessment (BEERA) for review on March 6, 2019. The 5.92-acre site is an active elementary school (Orchard Street School) surrounded by two playgrounds, a paved parking lot, and a grass covered recreational field. The site is underlain by soils containing historic ash fill material with levels of PAHs and lead above both residential and non-residential Direct Contact Soil Remediation Standards (DCSRS).

An Alternative Remediation Standard (ARS) application for lead and PAHs was filed in conjunction with this Alternative Remedy application. The ARS request was denied on the basis that the site is and will continue to be used as an elementary school; therefore, the Department's residential DCSRS are the applicable soil clean up standards for the site. This determination will impact the proposed remedial action workplan (RAW) for the site, which currently only includes excavating soil with lead concentrations above 1,278 mg/kg (more than 3 times the residential DCSRS) and no removal or additional capping of PAHs in soil. Use of presumptive remedies at the site has been determined by the LSRP to be impractical because the site is in the 100-year floodplain and the grade cannot be substantially changed.

Pursuant to N.J.S.A. 58:10B-12(g), the Department is required to establish presumptive remedies for any remediation initiated after May 7, 2010, at a site or area of concern (AOC) where new construction or change of use is proposed for residential purposes, for use as a child care center, or as a public or private school. If a person responsible for conducting remediation, initiated remediation at a school, child care center or residence before May 7, 2010, they are not subject to presumptive remedy requirements. However, they may submit a RAW to the Department if that person desires pre-approval for an Alternative Remedy, which was done for this site. Once a RAW is submitted with an Alternative Remedy proposal, Departmental approval must be obtained prior to approval of the remedial action. In addition to the proposed RAW for the site requiring revisions to achieve compliance with the residential DCSRS, the Alternative Remedy as currently proposed is lacking in detail. Buffer and barrier layer depths are not provided, and there is no mention of demarcation barriers or inspections to ensure engineering controls remain protective over time.

The Department has determined that the Alternative Remedy proposed for Block 2313, Lot 10 is **not in compliance** with the Technical Requirements for Site Remediation (N.J.A.C. 7:26E), the Remediation Standards (N.J.A.C. 7:26D), and the Alternative and Presumptive Remedy guidance document.

If you have any questions regarding this notice please contact, Erica Snyder in BEERA at 609-984-0325 or [erica.snyder@dep.nj.gov](mailto:erica.snyder@dep.nj.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin Schick". The signature is written in a cursive style with a large initial "K".

Kevin Schick  
Bureau Chief BEERA

cc: David Terry, LSRP  
Erica Snyder, NJDEP