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State of New Jersey

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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PHIL MURPHY
Governor

CATHERINE MCCABE
Commissioner

SHEILA OLIVER
Lt. Governor

MEMORANDUM

May 17, 2019

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

RE: Alternative Soil Remediation Standard Application
Ridgewood Ash Landfill
230 Demarest Street
Ridgewood, NJ 07450
PI# G000008572

Dear Ms. Kelly,

A Limited Human Health Risk Assessment and Alternative or New Soil Remediation Standard (ARS) Application Form was received by the Bureau of Environmental Evaluation and Risk Assessment (BEERA) on May 6, 2019 for the above referenced property. ARS for five polycyclic aromatic hydrocarbons (PAHs) and lead that require Departmental pre-approval were requested by the licensed site remediation professional (LSRP) that you retained, David Terry of WSP USA (LSRP #575840). The proposed ARS for each contaminant is listed in the table below, along with the maximum concentration detected on site and the default residential Direct Contact Soil Remediation Standard (DCSRS). The submittal requested that ARS for PAHs and lead is appropriate based on a difference in land use determination and recreational exposure scenario.

Chemical Name	Maximum Concentration on Site (mg/kg)	Residential Soil Remediation Standard (mg/kg)	Proposed Soil Remediation Standard (mg/kg)
Benzo(a)anthracene	16.78	5	16.78
Benzo(a)pyrene	17.9	0.5	17.9
Benzo(b)fluoranthene	11.9	5	11.9
Dibenz(a,h)anthracene	1.67	0.5	2.07
Indeno(1,2,3-c,d)pyrene	5.15	5	5.15
Lead	2,280	400	1,278

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 with no change in use proposed. The site is underlain by soils containing historic ash fill material with levels of PAHs and lead above both residential and non-residential DCSRS. ARS were proposed using a significantly reduced exposure frequency (days/year) and exposure duration (years) at the recreational field, playgrounds, and surrounding ingress/egress areas. Pursuant to the definition of "residential direct contact soil remediation standard" in 7:26D-1.5, residential DCSRS are established to protect human health at residential use sites, schools (pre-K-12) and childcare centers. As such, BEERA disagrees with the LSRP's conclusion that a different land use determination would apply to this site. Although, BEERA has and will accept ARS requests at playgrounds and recreational fields using a recreational land use exposure scenario, they will not be accepted on a site where a school and/or childcare facility is also present. Based on the current and future use of the site as an elementary school, the Department's residential DCSRS are applicable and the proposed ARS are denied.

In addition, 0.5-acre functional areas were used to demonstrate compliance with the proposed ingestion-dermal ARS using USEPA area guidance. A 0.25-acre functional area is to be used for the site, as detailed in the Department's *Technical Guidance for the Attainment of Remediation Standards and Site-Specific Criteria*.

If you have questions regarding this notice, you may contact Erica Snyder at (609) 984-0325.

Sincerely,



Kevin Schick
Bureau Chief, BEERA

cc: David Terry, LSRP
Erica Snyder, NJDEP