



State of New Jersey

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BOB MARTIN
Commissioner

May 19, 2015

John Occhipinti
BRAC Environmental Coordinator
OACSIM – U.S. Army Fort Monmouth
PO Box 148
Oceanport, NJ , 07757

Re: *Final Environmental Condition of Property Supplemental Phase II Site Investigation
Work Plan for Parcels 28, 38, 39, 49, 57, 61, and 69 dated February 2015*
Fort Monmouth
Oceanport, Monmouth County
PI G000000032

Dear Mr. Occhipinti:

The New Jersey Department of Environmental Protection (Department) has completed review of the referenced report, received February 5, 2015, prepared by Parsons Government Services Inc. (Parsons), on behalf of the U.S. Army Engineering and Support Center, Huntsville (USAESCH). As indicated in the report, activities are to be performed with the goal of Decision Document acceptance in compliance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the National Contingency Plan (NCP), 40 CFR Part 300, and “to the extent possible to meet the requirements of New Jersey Administrative Code (NJAC) 7:26E Technical Requirements for Site Remediation”.

The workplan describes Site Investigation activities to be performed at the ECP Parcel referenced above. Comments and questions are as follows:

ECP Parcel 28

Page 1-15, Line 33 – The arsenic noted at P28-SB3-C was considered representative of naturally occurring conditions due to site specific information for that particular area of concern, rather than relative to the “CWA Background Concentration” (CWBC) referenced on line 33 and the Weston Study alluded to throughout this and previous submittals, and the determination was made *only* for that area of concern. Although naturally occurring levels of various constituents may be present throughout various areas of the Fort, as this office has indicated (and the Army acknowledged), the background study previously performed for the property was not accepted by

the Department as representative of background conditions for any constituent for any media at the site, and concentrations noted during that study should not be referenced as "background" concentrations for either the Charles Wood Area or the Main Post. Any determinations of naturally occurring conditions are to be made on an area specific basis, as previously discussed.

Page 1-16 Sediment Investigation Results – References to the elevated levels of constituents found close to and beyond the property bounds, upgradient of Fort activities, are not included.

Sampling is not included in this workplan, as it was previously performed. This office awaits submittal of the findings of same.

ECP Parcel 38

In July of 2012, the Department of Army submitted a Proposed *Temporary Groundwater Sampling Plan for Parcel 38 Former Outdoor Pistol Range (1940-1955)*. This office approved the proposal, which included the installation of seven ground water sampling locations, in August of 2012, however, the remedial efforts were apparently not performed. The proposal included in the February 2015 workplan includes the collection of 15 shallow soil borings and the installation of three monitor wells. The proposal cannot yet be approved.

Although the soil boring locations do appropriately incorporate that area noted as within the former firing range, the sampling depth is inadequate to evaluate the soil, particularly as the area has undergone alteration. As proposed, soil samples are to be collected from surface soils or the upper inches of soil beneath the pavement, however, soil sampling must also be performed to depths of at least 36", with continuous sampling conducted in 6" increments.

The proposed monitor well locations are not adequate to evaluate impact by this area of concern. Proposed well locations FTMM-38-GW-MW01 and FTMM-38-GW-MW02 are acceptable. However, two additional recommended well locations have been added within the former firing range area to provide evaluation points within the potential source area, particularly as the soils have been reworked. The attached figure includes recommended well locations, designated by an "X".

ECP Parcel 39

No additional sampling is proposed; as referenced as anticipated on page 1-19, line 23, a request for designation of no further action for surface soil was submitted on May 11, 2015; review by this office is pending.

ECP Parcel 49

Page 1-20 discusses various reasons for the possible presence of PAHs. As indicated in the Department's July 10, 2012 correspondence, although it was agreed elevated levels of BN (more specifically PAH) constituents found at the parcel may possibly be related to asphaltic paving rather than a discharge, insufficient information had been provided, and the previously approved proposal for additional sampling remained appropriate at each location exhibiting an exceedance

(that sampling has apparently not been performed). Nor do the reasons cited on page 1-20 explain the presence of PCBs above standard which were noted at two of the original five elevated PAH locations as well as a third location.

The proposal indicates the five locations noted in the 2008 SI as exhibiting historical PAH exceedances will be resampled to confirm the original data set. The sampling intervals are acceptable, however, please ensure sampling is performed in 6" increments. The sampling locations noted on Figure 1.7, however, do not all correlate to locations as noted on Figure 3.10-1 of the referenced 2008 SI. Specifically, original sampling locations P49-SB4 and P49-SS13 are not replicated by FTMM-49-SS-03 or FTMM-49-SS-01.

As regarding the resampling of the three locations exhibiting PCBs above standard, the proposal is acceptable for confirmation sampling and horizontal delineation, however, it does not appear to allow for the necessary vertical delineation?

GROUND WATER

Page 1-21 – Although it is possible the metals found in monitor wells are reflective of naturally occurring conditions in this area, the Department has not agreed the metals noted at Parcel 49 are representative of background conditions.

As regarding the benzene and bromodichloromethane, the installation and sampling of the two permanent monitor wells as proposed is acceptable.

Finally, the January '07 ECP Report references Table 4.2-22 in the 1995 Weston SI, which indicates 0.68 ppm PCBs was noted in soil during sampling by a pole mounted transformer on the northwest side of Building 292. No information appears to have been submitted indicating this was addressed.

ECP Parcel 57

Page 1-23, line 35 – It is believed the NJDEP letter referenced in this sentence is the March 29, 2012 letter which referred to naturally occurring background conditions determined to be present at Parcel 28. That determination was specific to Parcel 28 only. The Main Post Background Concentrations (MPBC), line 38, as with the CWBC, were not accepted; background determinations are made on an area specific basis. As indicated in the Department's August 23, 2012 letter, insufficient evidence has been provided to determine the metals found in the parcel's monitor wells are unrelated to activities conducted within the parcel. Were the metals (or materials containing the metals) ever handled, used or disposed of at this parcel? What investigation was conducted to allow for this determination? Additional information/technical rationale was (is) to be provided in support of the position that exceedances are reflective of naturally occurring conditions and sample turbidity, rather than a discharge.

Section 3.2.1.4 -

- PCBs – The proposal for PCB sampling is approved.
- PAHs – The proposal for PAH sampling is approved, however, please ensure sampling is performed in 6" increments.

Table 3.1 – Location and Extent of Contamination – The table narrative indicates the SVOCs found in the soil samples are attributed to anthropogenic sources (e.g. asphalt). This has not yet been demonstrated to the Department, particularly as PCBs have been found in conjunction with the PAHs in two of those locations.

ECP Parcel 61

As indicated in the submittal, this office previously agreed no additional action was necessary.

ECP Parcel 69

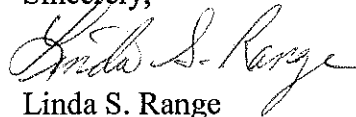
Soil - A review of the historic data revealed no analytical results for petroleum hydrocarbons, which has always been a required parameter for characterization of waste oil AOCs. Therefore, although PCB sampling at each location is acceptable, regulations specifically require sampling at each of the locations proposed for EPH analyses, with 25% of those samples with EPH detected further analyzed for parameters as per Table 2-1 of the Technical Requirements for Site Remediation (PCBs in this instance).

Ground Water – The PCE sampling, as proposed, is approved.

Table 3.1 – Location and Extent of Contamination – The narrative indicates “COCs were not detected in soil...”, however, the required analyses for PCBs has not yet been performed.

Please contact this office with any questions.

Sincerely,



Linda S. Range

C: Joe Pearson, Calibre
James Moore, USACE
Rick Harrison, FMERA
Joe Fallon, FMERA
Frank Barricelli, RAB

