



State of New Jersey

CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

DEPARTMENT OF ENVIRONMENTAL PROTECTION
Bureau of Case Management
401 East State Street
P.O. Box 420/Mail Code 401-05F
Trenton, NJ 08625-0028
Phone #: 609-633-1455
Fax #: 609-633-1439

BOB MARTIN
Commissioner

June 16, 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 Addendum for Parcels 34, 50, 51, 52, 66, 80 and 83 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 March 2, 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”, as well as support closure of environmental sites to facilitate transfer of real property.

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

Tables 3.1 and 3.2 also will require revision based upon the following comments.

Parcel 34/Building 2567/FTMM-58

Section 2.4.1, Page B4-line 2 – Although this office agrees with the statement “post excavation soil samples were collected...and analyzed for TPHCs, VOCs, and lead”, review of historic

information appears to indicate elevated levels of benzene remain in the soil in the area of the dispenser island south of Building 2567. See additional detail under Section 3.2, below.

Section 2.5, Page B-7, line 21 – This statement regarding the removal of piping was amended via email to Wanda Green (copy to Rob Youhas and Joe Pearson) on June 18, 2013 1519 hrs. The report documenting the investigation of the piping, however, as you likely are aware, has not been received by this office.

Section 3.2 Sampling Plan – Although it is agreed the proposal is appropriate for the TBA in ground water, the referenced submittal considers only the issue of TBA in ground water (the proposal for two annual sampling events of monitor wells 2567MW01 and 2567MW03 was approved on July 3, 2014). However, as briefly discussed in a conference call on June 12, 2015, a review of historic information appears to indicate levels of benzene above both the residential and non-residential criteria/standard remain in numerous locations in the vicinity of the dispenser area south of Building 2567. The information was obtained from the October 28, 2005 RIR/RAW, including Figure 2-1 dated 6/9/94, which indicates levels of benzene remain up to 85 ppm. The June 2010 RAPR appears to omit reference to analytical results from the post excavation soil sampling performed in 1993 during removal of USTs 42 through 45, stating only the samples were analyzed for TPHC, VOCs, and lead, however, a copy of the September 2, 2010 PBR Request contained within the submittal's Appendix B referenced benzene remaining to 45 ppm. Pages i, 3-5 and 6-1 of the June 2010 RAPR also indicate the "remaining original UST dispenser island areas" would undergo assessment upon BRAC closure. It is understood available information is currently being evaluated to determine the status of the soils in this area. At this time, however, this office considers the soil in the area an unaddressed area of concern in need of additional delineation.

Parcel 50

Section 2.2.1 - FTMM-54 - Page C-2 lines 39 & 42 reference the year of the eleven tank removals as 2003, while page C-3, line 17 indicates removal of the eleven tanks was 1993, which appears correct.

Section 2.2.2 – FTMM-55 - Page C-5, line 11 – Waste oil UST No. 91533-193 is indicated as being NFAed in a January 10, 2003 letter. Although the tanks referenced on line 15 were found on the January 10, 2003 NJDEP NFA letter, that letter does not appear to reference UST No. 91533-193; no record of a letter of no further action for that tank could be located.

Section 3.2 Sampling Plan – As noted on page C-6, line 37, levels of TPHC remained in soil at the former location of UST No. 81533-64 at 16,200 and 11,900 ppm, at samples A and B, both at a depth of 5.5-6'. The proposal indicates horizontal delineation sampling is to be performed at locations A (16,200 ppm) and F (9,670 ppm), which is acceptable. Vertical delineation is also required. It is unclear, however, why sampling is not proposed at sample location B, as it does not appear to be vertically delineated.

The Department's EPH Protocol, http://www.nj.gov/dep/srp/guidance/srra/eph_protocol.pdf, is to be followed, with contingency samples collected/analyzed as required. As per EPH Methodology Version 3.0, the non-fractionation option is appropriate only if the EPH level is anticipated to be below 1,700 ppm. As this cannot be presumed, the "unfractionated EPH" does not appear to be the appropriate option.

Parcel 51

Section 2.5, Page D-5, line 40 and Page D-6, line 4 - The submittal indicates the UST questions contained in this office's July 10, 2012 letter are to be addressed under the UHOT program. This office looks forward to submittal of same.

Section 3.0 - With receipt of the additional clarification provided on page D-4, as well as the figure received on June 15, 2015, the questions noted in the Department's July 2012 letter relative to USTs 1123B and 1123C have been answered. It is agreed no additional action is necessary for UST 1123B. However, it is not agreed there are no COCs at Parcel 51. As indicated on line 11, 2-methylnaphthalene was found in the ground water at P51-G12 above the Ground Water Quality Standards (GWQS), as reported in the July 2008 SI. TPHC (collected due to elevated field screening readings) was also found in soil at that location at 6-6.5' at 7,487 ppm. Additional sampling is necessary.

Motor Pool Area - Although information regarding the 750 Motor Pool is not contained within this submittal, concerns regarding the area include, but are not limited to, adequate investigation of;

- Building 750 - UST 191 (15,000 gallon diesel) & UST192 (8000 gallon unleaded gasoline)
- two outdoor service pits for draining vehicle oil, the pipes from which discharged to a former oil water separator (OWS), north of garage bays
- current wash rack previously connected to former OWS, then to new OWS
- Building 753 - three hydraulic lifts and floor drain
- Building 754 - floor drain

Is FTMM 68/Building 700 not considered within Parcel 51?

Parcel 52/FTMM-53/Building 699 Gas Station

Section 1.0, Page E-1, line 8 - As many of the parcel narratives include, a listing of NJDEP correspondence by year is provided, which refers the reader back to *Section 5 References* to ascertain which document is being referenced. It does not include, however, this office's January 8, 2014 response to the September 2013 RI/FS Workplan, nor the May 6, 2014 response to the Army's April 22, 2014 response to same, in which delineation sampling was discussed and

the revised proposal accepted. Results of the investigation have not yet been received by this office.

Section 2.4, Previous Investigation and Historical Data – No mention is made of the 2000 gallon #2 fuel UST, 0081533-112, given an NFA designation in January of 2003, nor more particularly, of waste oil UST 0081533-197, a 1000 gallon waste oil UST removed in January of 1992 from east of UST-112, at which analytical results indicate TPHC to 11,600 ppm remains in soil. As acceptably indicated in the Army's April 22, 2014 response letter, Response C4, additional sampling was to be performed.

Section 2.4, Page E-5, lines 21-27 – It appears "IASL" (indoor air screening levels) may have been inadvertently used in the narrative, on lines 22, 26 and 27. These lines reference sub-slab results, the measure of which is against the SGSLs (Soil Gas Screening Levels), accurately referenced on lines 18, 20, 23, 25 and 25.

Section 2.5 Synthesis of Results, Correspondence and Data Gaps – As indicated above, the submittal does not appear to include the activities proposed in the September 2013 RI/FS Workplan, nor the followup communications.

Section 3.2 Sampling Plan – As indicated, above and through previous correspondence, additional delineation sampling is necessary.

Parcel 66

Section 1.0 & Section 2.5, Page F-3, line 15 – No mention appears to be made among the listed correspondence between NJDEP and FTMM of the *August 1, 2012 Proposed Soil Sampling and Delineation Plan for Electrical Substations at Building 2700 (Charles Wood Area) and Building 978 (Main Post)*, nor the September 10, 2012 NJDEP approval letter for delineation of the PCBs.

Section 2.2, Page F-1, line 20 – typo - It is believed FTMM-56 should read FTMM-66.

Section 2.2, Page F-2, lines 2-4 & Section 2.5 – The submittal references the ECP Report's Appendix A, stating, "no release or disposal of hazardous substances or petroleum products has occurred at Parcel 66...", and that Parcel 66 was assigned an ECP Category of 1. This office does not agree with same, as PCBs are noted present up to 0.84 ppm.

Section 3.2 Sampling Plan – The sampling as proposed on pages F-3 and F-4 is acceptable.

Parcel 80

Section 1.0, line 14 – For clarification, per the 2008 ECP Main Post map (Figure 19), FTMM-56 is also known as Parcel 84 (Building 80), a small ¼+ acre area designated within the larger Parcel 83.

Section 2.4 Previous Investigations and Historical Data – As previously indicated, the Weston report was not accepted by the Department as representative of background conditions at Fort Monmouth.

The section also references the July 10, 2012 letter, in which the NJDEP requested additional information regarding the basis for determination of the sample locations, i.e., were as-builts or other plans for the demolished buildings used to assist in locating former floor drains, septic systems, discharge points, etc, and therefore the boring locations. No rationale for sample location selection has been received; therefore a determination remains unavailable regarding the adequacy of the soil sampling performed.

Section 3.2 Sampling Plan – The proposal to further evaluate beryllium in ground water reported in the 2008 SI as indicated is acceptable.

Parcel 83

In October of 2008, the NJDEP requested depiction of all areas of concern (AOCs) on a site figure. Although a structures figure was submitted, no figure designating AOCs has been received.

Section 2.4, Page H-4 - As previously indicated, the Weston “background” report was not accepted by the Department. As regarding the elevated levels of arsenic (SB10A, SB9A), as acknowledged in Section 3.1, this office at this time does not agree these levels of arsenic are representative of naturally occurring conditions. Arsenic is currently considered a contaminant of concern, based on analytical findings at P83-SB9&10. As the NJDEP July 10, 2012 correspondence stated, although Fort Monmouth site soils are often associated with elevated levels of naturally occurring arsenic, the parcel specific soil analytical results, the lead to arsenic ratio, and the decrease of arsenic with depth at those locations exhibiting an elevated level do not appear to indicate the exceedences are naturally occurring, and must be investigated and included in a remedy.

Section 2.5, line 35 – The submittal indicates further information on the various USTs referenced in the July 10, 2012 letter are to be referred to the “UHOT Program”. Although not familiar with same, this office looks forward to receipt of additional information regarding the USTs.

Section 3.2 Sampling Plan – Sampling at the former Building 72 area to better define PAH exceedances, as proposed, is acceptable.

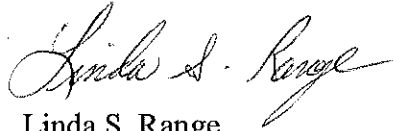
Section 3.2, lines 15, 16 – PCBs - Please ensure these delineation samples, include PCBs analyses, for delineation of the 0.8 ppm PCBs noted at P83-B5, 1-1.5’.

Section 3.2 – Building 279 – Although the proposed sampling locations are acceptable, they are inadequate to complete delineation. Arsenic remains undelineated at P83SB10. It is anticipated elevated levels of lead may be present west of P83SB9; what efforts for delineation

are planned? If location FTMM-83-SS-13 is considered a resample of P83SB9, it should be located within 10' feet of the original sample location.

Please contact this office if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Linda S. Range". The signature is written in black ink and is positioned above the printed name.

Linda S. Range

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