



State of New Jersey

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Commissioner

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Lt. Governor

December 30, 2015

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

Re: **Revision 1 - Final Environmental Condition of Property Supplemental Phase II Site Investigation Work Plan Addendum for Parcels 28, 38, 39, 49, 57, 61 and 69 dated November 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 November 24, 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 as indicated above. The revised workplan has addressed many of the previously noted questions and issues; remaining comments are as follows:

Parcel 28

Previous comments have been adequately addressed. Please note, however, although the Department of the Army may of course analyze ground water samples for both total and dissolved (filtered and unfiltered) concentrations of lead for its own purposes, this program accepts only unfiltered analytical results for consideration in decisions relative to case closure.

Parcel 38

The DEP's May 19, 2015 correspondence had indicated soil sampling was to be performed to depths of at least 36", with continuous sampling conducted in 6" increments. Although the proposal states sampling will be performed to a depth of 36 inches bgs, the proposal includes sampling only from the 0 to 0.5, 1.25 to 1.75 and 2.5 to 3.0 feet bgs. As the soils in the area have been re-worked, this is unacceptable; continuous sampling is required for adequate evaluation.

The monitor well locations as proposed are acceptable at this time. As above, however, this program does not accept filtered ground water analytical results.

Parcel 39

No additional comment.

Parcel 49

Although Section 1.9.4, and Response D1 of the November 19, 2015 correspondence accompanying the submittal generally reference only exceedances of the former NRDSCC, further review of the sampling performed during the 2007 Site Investigation indicate exceedances of the current RDCSRS at 11 locations (0-6" unless otherwise indicated) as below:

P49-SB1-C (5.5-6') – benzo(a)anthracene 0.73, benzo(a)pyrene 0.56, benzo(b)fluorene 0.75

P49-SB3 -A – PCBs 0.34; benzo(a)pyrene 0.44, benzo(b)fluorene 0.67

P49-SB4-A (6-12") – benzo(a)anthracene 2.5, benzo(a)pyrene 2.2, benzo(b)fluorene 2.8

P49-SB5-A – benzo(a)pyrene 0.46

P49-SS7-A – PCBs 0.47; benzo(a)anthracene 80, benzo(a)pyrene 54, benzo(b)fluorene 75, benzo(k)fluorene 29, chrysene 79, dibenz(a,h)anthracene 2.6, indeno(1,2,3-cd)pyrene 18

P49-SS8-A – PCBs 8.85; benzo(a)anthracene 3.6, benzo(a)pyrene 2.6, benzo(b)fluorene 3.9, benzo(k)fluorene 1.5, indeno(1,2,3-cd)pyrene 0.93

P49-SS9-A – benzo(a)anthracene 10.0, benzo(a)pyrene 9.8, benzo(b)fluorene 9.2, bkf 6.3, chrysene 10.0, dibenz(a,h)anthracene 1.3, indeno(1,2,3-cd)pyrene 3.5

P49-SS10-A – benzo(a)pyrene 0.61, benzo(b)fluorene 0.96

P49-SS11-A – benzo(a)pyrene 0.31

P49-SS12-A – benzo(a)pyrene 0.36

P49-SS13-A – benzo(a)anthracene 0.81, benzo(a)pyrene 0.73, benzo(b)fluorene 1.2

All locations at this time are considered representative of contamination which, under the Technical Requirements for Site Remediation, must be addressed. Several of the above locations (underlined) are proposed for resampling, with step-out borings/sampling as needed. This is acceptable.

P49-SS13 has been identified in the Revised SIWP as containing an elevated level of PAHs attributable to DAP. This office does not agree. P49-SS10 through SS12 are in the area of P49-SS13, and also contain levels above applicable standard which is representative of contamination that must be addressed at this time. Benzo(a)anthracene is present at 0.81 ppm, benzo(a)pyrene from 0.31 to 0.81 ppm, and benzo(b)fluorene from 0.96 to 1.2 ppm at these four locations. Additional sampling may of course be performed if it is believed the results are representative of asphalt "cross contamination".

Parcel 57

Section 1.9.5, line 38 references "PAHs detected in shallow soil can be attributed to anthropogenic sources such as asphalt, road base, and DAP versus onsite historical activities." Historic operations in this parcel also, of course, included coal storage and a railroad unloading area.

Page 1-24 line 12 discusses sampling performed in 2010 which were either non-detect or at concentrations below the RDCSRS; a review of the data indicated certain of the MDLs exceeded their respected RDCSRS.

As stated in prior correspondence, the Main Post Background Concentrations (MPBC), as with the CWBC, were never accepted by the DEP. Continued reference to the document or individual constituent "MPBC"s within a submittal will not be considered in evaluations. As previously specified, background determinations are made on an area specific basis.

Also, as above, filtered ground water analytical results as discussed on page 1-25 (and page 7 of the accompanying correspondence) are not accepted by the Department.

Parcel 61

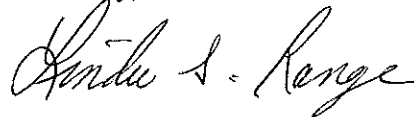
As indicated in the May 2015 DEP correspondence, this office previously agreed no additional action was necessary. As detailed for the November conference call, no further documentation from this office is necessary.

Parcel 69

All comments addressed.

Please contact this office if you have any questions.

Sincerely,



Linda S. Range

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