



State of New Jersey

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BOB MARTIN
Commissioner

April 14, 2016

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

Re: *Final ECP Parcel 57 Round 2 Work Plan Addendum*
Fort Monmouth
Oceanport, Monmouth County
PI G000000032

Dear Mr. Colvin:

The New Jersey Department of Environmental Protection (Department) has completed review of the referenced report, received March 29, 2016, prepared by Parsons Government Services Inc. (Parsons), to supplement the soil and ground water sampling previously completed at Parcel 57. The workplan includes results of the most recent sampling, conducted from September to November of 2015, and describes additional sampling activities proposed for further delineation of the PAHs and PCBs at the ECP Parcel referenced above. Comments and questions are as follows:

PAHs

The proposal is acceptable with the exception of the following locations.

- PAR-57-SS-23 – no delineation to the east is apparent; is contamination assumed to extend to the eastern parcel boundary (and into Parcel 65)?
- PAR-57-SS-09 – it is not clear near surface sampling was performed to the west of this location; what is considered the westerly point of delineation for surficial contamination in the area of PAR-57-SS-09/P57-A1-A?

PCBs

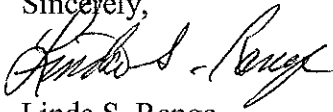
The soil sampling proposal is acceptable. If PCBs above the Default Impact to Ground Water Soil Screening Level (or a site specific Impact to Ground Water Site Remediation Standard subsequently developed) are found to extend to within 2' of the ground water table, a ground water investigation will be necessary.

Ground Water

The proposal regarding metals is acceptable. It is understood various sources for any noted exceedances will be evaluated, including upgradient ground water quality, natural glauconitic soils and/or fill used during infrastructure development. Please keep in mind, however, if the determination is made the ground water has been impacted by the fill material (historic fill), a CEA will be necessary (see http://nj.gov/dep/srp/guidance/srra/historic_fill_guidance.pdf).

Finally, as you are likely aware, although the proposal is for collection of both filtered and unfiltered samples, the NJDEP requires metals analysis to be performed on unfiltered ground water samples. This is pursuant to the requirements of the Safe Drinking Water Act and the Clean Water Act and is to obtain a representative sample as it actually occurs in the aquifer and to maintain consistency in sample handling for samples collected for both inorganic and organic analysis. Therefore, although you may of course perform the collection of both filtered and unfiltered samples, only unfiltered analytical results can be used for regulatory compliance.

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