



State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
Division of Remediation Management & Response
P.O. Box 413
Trenton, New Jersey 08625-0413

JON S. CORZINE
Governor

LISA P. JACKSON
Commissioner

April 17, 2007

Colonel Ricki L. Sullivan
U.S. Army Garrison, Fort Monmouth
286 Sanger Avenue
Fort Monmouth, NJ 07703-5101

RE: Community Environmental Response Facilitation Act (CERFA) Report and
Environmental Condition of Property (ECP) Report
Fort Monmouth, NJ

Dear Colonel Sullivan:

The NJDEP Division of Remediation Management & Response (DRMR) has reviewed the following reports on Fort Monmouth:

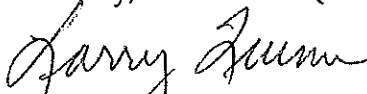
1. Community Environmental Response Facilitation Act (CERFA) Report dated 29 January 2007,
2. Environmental Condition of Property (ECP) Report dated 29 January 2007.

Our comments are attached. NJDEP did not review the entire ECP Report and Appendices. Our review concentrated on the classification of properties in the CERFA Report, which is based upon the ECP Report. As you will see, NJDEP disagrees with the classification of several parcels on both the Main Post and the Charles Wood Area. Therefore, we don't concur with the CERFA and ECP Reports in their current form. However, we have not taken issue with any of the parcels that were designated as "uncontaminated property".

Thank you for the opportunity to comment on the CERFA and ECP Reports. I look forward to continuing to work with your staff to address the remaining site remediation areas of concern at Fort Monmouth.

You or your staff may contact me at 609-633-0766 with any questions on the enclosed comments, or any other site remediation matters at Fort Monmouth.

Sincerely,

A handwritten signature in cursive script that reads "Larry Quinn".

Larry Quinn, P.E., CHMM, Case Manager
Bureau of Case Management

Attachment

C:

Joseph Fallon, DPW, Fort Monmouth

NJDEP COMMENTS ON CERFA REPORT & ECP REPORT
FORT MONMOUTH SITE

1. ECP Parcel Category Definitions: NJDEP has the following concerns regarding the category definitions:
 - a) Category 2 is defined as "Areas where **only** release or disposal of petroleum products has occurred" (emphasis added). That language could lead outside parties to conclude that such areas are of no environmental concern, when in fact, sites where gasoline has been released can be of great environmental concern. This category also gives no indication that response actions have been initiated or completed, as the hazardous substance categories do.
 - b) Category 7 is defined as "Areas that are not evaluated **or** require additional evaluation" (emphasis added). The "or" creates uncertainty, as the category could be read as simply "Areas that are not evaluated", with no further action taken. A clearer definition would be "Areas that require further evaluation".
2. FTMM-4 and FTMM-14 Landfills: NJDEP concurs with these AOCs as Category 5. However, they shouldn't be grouped with "NFA sites" in Section 5.2.1.2 of the ECP report. NJDEP hasn't prepared official written comments yet, but based upon preliminary reviews, NFA won't be issued for these sites in their present condition.
3. FTMM-15 (Parcel 78, Water Tank) and FTMM-16 (Parcel 81, Former Pesticide Storage Area): These are both designated as Category 4 in the ECP. They should both be changed to Category 5, pending submission and approval of the RA Reports, as it is possible that additional sampling or cleanup will be needed at these AOCs.
4. FTMM-20 (Parcel 75, Pre-1941 Former Main Post STP): This AOC is designated as Category 3. Category 7 would be more appropriate, pending NJDEP review of the NFA request.
5. FTMM-47 (Buildings 1002, 1208, 1209 Former PCB Transformer Sites): This AOC is designated as Category 2 (Building 1002) and Category 1 (Buildings 1208 & 1209). Since the report text states that the minor PCB source areas will be addressed when the transformers are replaced or removed from service, all 3 areas should be Category 5. Also, we found no confirmation of the statement on Page 5-64 of the ECP Report that "NFA determination was approved by the NJDEP."
6. Parcel 53 (700 Area): This AOC is designated as Category 4. NJDEP has recently determined that ground water sampling and additional delineation of soil contamination are required at this AOC. Therefore, Category 5 is the appropriate classification.

NJDEP COMMENTS ON CERFA REPORT & ECP REPORT
FORT MONMOUTH SITE

7. Parcel 56 (800 Area): This AOC is designated as Category 4. NJDEP has recently determined that ground water sampling and additional delineation of soil contamination are required at this AOC. Therefore, Category 5 is the appropriate classification.
8. Parcel 82: The ECP Parcel Summary in Appendix A states that PCB contaminated soil was excavated at this small AOC within the 400 Area. However, no description of such a cleanup could be found in the text. The narrative on "Site Number 12, Buildings 121, 122 & 123" in Section 5.5.2 appears to discuss this area, but with no mention of a cleanup. NJDEP is therefore unable to concur with the Category 4 designation for Parcel 82. We would concur if all soils with PCBs greater than 0.49 mg/kg were removed and ground water wasn't impacted.
9. FTMM-23 (CW-2 Wastewater Treatment Lime Pit): This AOC is not specifically shown on CERFA Figure 1, but falls within Parcel 15, which is designated as Category 7. This AOC should be shown on Figure 1 and designated as Category 5, pending NJDEP review of the NFA request.
10. FTMM-28 (Parcel 7, CW-6 Former Pesticide Storage Building): This AOC is designated as Category 4. Category 5 would be more appropriate, pending NJDEP review of the NFA request.
11. FTMM-29 (Parcel 12, CW-7 Former PCB Transformer Location): This AOC is designated as Category 4. NJDEP has recently determined that PCBs in soil greater than the RDCSCC of 0.49 mg/kg were left at this AOC, so Category 5 is the appropriate classification.
12. Radiological AOCs: The Final "Historical Site Assessment and Addendum to Environmental Condition of Property Report" dated January 2007, by Cabrera Services addresses potential radiological areas of concern. Section 5.8 of the ECP Report summarizes the findings of that report. Neither report definitively states what future actions will be taken at the identified radiological AOCs. The ECP Report states on page 5-75 "The buildings and survey areas found to be potentially impacted include building Nos. 275, 283, 292, and 2540," yet nothing is said about future actions. Those 4 buildings should be fully investigated and remediated if necessary, and should also be Category 5 in the CERFA Report.

Bc:

K. Petrone, BCM

J. Prendergast, BEERA

L. Whitesell, BGWPA

B. Venner, BCM

E. Putnam, RRE

K. Koschek, Environmental Regulation