



## DEPARTMENT OF THE ARMY

OFFICE OF ASSISTANT CHIEF OF STAFF FOR INSTALLATION MANAGEMENT  
U.S. ARMY FORT MONMOUTH  
P.O. 148  
OCEANPORT, NEW JERSEY 07757

16 March 2017

Ms. Linda Range  
New Jersey Department of Environmental Protection  
Case Manager  
Bureau of Southern Field Operations  
401 East State Street, 5<sup>th</sup> Floor  
PO Box 407  
Trenton, NJ 08625

**Subject: Response to NJDEP 16 December 2016 Comments Re: Site Investigation  
Letter Report For Parcel 80 (Former Photo Processing)  
Fort Monmouth, NJ  
PI G000000032**

Dear Ms. Range:

The Fort Monmouth (FTMM), the U.S. Army Corps of Engineers (USACE) and Parsons have reviewed the subject comments. Responses to the comments are provided below in the order in which they were presented in the comment letter.

**A. VANADIUM**

**A. COMMENT:** Analytical results from additional sampling were all reported as below the Residential Direct Contact Soil Remediation Standard (RDCSRS), indicating only the original exceedance of 82.7 ppm at CU-3 is present. As vanadium is unrelated to operations associated with the parcel, it is agreed no further action is necessary as regarding vanadium in soil at Parcel 80.

Vanadium, as indicated, may at times be unrelated to site operations, but rather, be associated with naturally occurring conditions. When it is demonstrated vanadium is unrelated to site operations, the Department is currently accepting Alternative Remediation Standard requests based upon the USEPA Regional Soil Screening Level of 390 mg/kg for residential exposure. For additional parcels or areas of concern at which vanadium is found above RDCSRS, but which is unrelated to site operations, continue to address its presence in the narrative as has been done in this submittal, but also please complete the "Remediation Standard Notification Spreadsheet" found at <http://nj.gov/dep/srp/s1Ta/fonns/>, located directly beneath "Alternative or New Remediation Standard and/or Screening Level Application form" in the SRP website.

**A. RESPONSE:** Agreed. The Army will complete and submit the Remediation Standard Notification Spreadsheet when vanadium is found at other parcels.

**B. ARSENIC**

**B. COMMENT:** Based on the operations conducted within the subject parcel, the analytical results, the soil type encountered, and the documentation submitted to support same, it is agreed the levels of arsenic noted within Parcel 80 are present due to naturally occurring background conditions, rather than as the result of a discharge.

**B. RESPONSE:** Agreed.

**C. PESTICIDES**

**C. COMMENT:** Analytical results from sampling performed in 2010 indicate the presence of elevated levels of chlordane in the soil. The pesticide is not considered related to operations performed on Parcel 80 (former Photo Processing), but is reflective of normal pesticide application practices. Although it is agreed the chlordane is representative of historic pesticide applications, the levels of chlordane are present above applicable remediation standards; therefore, action to address said exceedances is required prior to DEP concurrence for no additional action necessary.

**C. RESPONSE:** The chlordane exceedance in soil is likely related to historic pesticide application, performed in compliance with manufacturers specifications. As per Army policy, no additional action will be performed at Parcel 80. However, given the low levels observed at the site – should the current landowner choose to pursue additional means to obtain a NFA (through compliance averaging for example), the Army will continue to support the redevelopment of the former Fort Monmouth property whenever possible.

**D. GROUND WATER**

**D. COMMENT:** The evaluation determined there is no anthropogenic source of beryllium at this parcel; the beryllium concentrations noted are attributed to naturally occurring conditions related to the glauconitic soils underlying the Fort Monmouth site. It is agreed no further action regarding ground water at Parcel 80 is necessary.

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**D. RESPONSE:** Agreed. The Army requests a formal NFA designation for Parcel 80 groundwater from the NJDEP.

We look forward to your review of these responses and the issuance of an NFA for groundwater for Parcel 80 from the NJDEP. Should you have questions or require additional information, please contact me by phone at (732) 380-7064 or by email at [william.r.colvin18.civ@mail.mil](mailto:william.r.colvin18.civ@mail.mil).

Sincerely,



William R. Colvin, PMP, CHMM, PG  
BRAC Environmental Coordinator

cc: Linda Range (3 hard copies)  
Delight Balducci, HQDA ACSIM  
Joseph Pearson, Calibre  
James Moore, USACE  
James Kelly, USACE  
Cris Grill, Parsons



**New Jersey Department of Environmental Protection**  
**Site Remediation Program**

**Report Certifications for RCRA GPRA 2020, CERCLA, and Federal Facility Sites**

These certifications are to be used for reports submitted for RCRA GPRA 2020, CERCLA, and Federal Facility Sites. The Department has developed guidance for report certifications for RCRA GPRA 2020, CERCLA, and Federal Facility Sites under traditional oversight. The "Person Responsible for Conducting the Remediation Information and Certification" is required to be submitted with each report. For those sites that are required or opt to use a Licensed Site Remediation Professional (LSRP) the report must also be certified by the LSRP using the "Licensed Site Remediation Professional Information and Statement". For additional guidance regarding the requirement for LSRPs at RCRA GPRA 2020, CERCLA and Federal Facility Sites see [http://www.nj.gov/dep/srp/srra/training/matrix/quick\\_ref/rcra\\_cercla\\_fed\\_facility\\_sites.pdf](http://www.nj.gov/dep/srp/srra/training/matrix/quick_ref/rcra_cercla_fed_facility_sites.pdf).

Documents:

"RTC to NJDEP Comments Parcel 80"

**PERSON RESPONSIBLE FOR CONDUCTING THE REMEDIATION INFORMATION AND CERTIFICATION**

Full Legal Name of the Person Responsible for Conducting the Remediation: William R. Colvin  
 Representative First Name: William Representative Last Name: Colvin  
 Title: Fort Monmouth BRAC Environmental Coordinator (BEC)  
 Phone Number: (732) 380-7064 Ext: \_\_\_\_\_ Fax: \_\_\_\_\_  
 Mailing Address: P.O. Box 148  
 City/Town: Oceanport State: NJ Zip Code: 07757  
 Email Address: [william.r.colvin18.civ@mail.mil](mailto:william.r.colvin18.civ@mail.mil)

This certification shall be signed by the person responsible for conducting the remediation who is submitting this notification in accordance with Administrative Requirements for the Remediation of Contaminated Sites rule at N.J.A.C. 7:26C-1.5(a).

*I certify under penalty of law that I have personally examined and am familiar with the information submitted herein, including all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, to the best of my knowledge, I believe that the submitted information is true, accurate and complete. I am aware that there are significant civil penalties for knowingly submitting false, inaccurate or incomplete information and that I am committing a crime of the fourth degree if I make a written false statement which I do not believe to be true. I am also aware that if I knowingly direct or authorize the violation of any statute, I am personally liable for the penalties.*

Signature:  Date: 16 March 2017  
 Name/Title: William R. Colvin, PMP, CHMM, PG  
BRAC Environmental Coordinator