



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.

Document: "Response to Comments to NJDEP Comments on Final Landfill Boundary Refinement for FTMM-04 only dated January 2016"

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: BRAC Environmental Coordinator
 Phone Number: (732) 380-7064 Ext: _____ Fax: _____
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 Email Address: 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: 10 January, 2017

Name/Title: William R. Colvin / BRAC Environmental Coordinator



DEPARTMENT OF THE ARMY

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

January 10, 2017

Ms. Linda Range
New Jersey Department of Environmental Protection
Bureau of Case Management
401 East State Street
PO Box 420/Mail Code 401-05F
Trenton, NJ 08625-0028

SUBJECT: *Final Landfill Boundary Refinement for FTMM-04 only dated January 2016*
Fort Monmouth, Oceanport, New Jersey
PIG000000032

Dear Ms. Range:

The Fort Monmouth (FTMM) team has reviewed the New Jersey Department of Environmental Protection (NJDEP) comments (letter dated September 22, 2016) on the subject submittal. Responses to NJDEP's comments are provided below in the order in which they were presented in the comment letter.

A. Landfill Boundary

A. COMMENT: *The boundaries of the landfill were further refined beyond that indicated on Figure 2-1 of the RIR. Based upon reviews of the historic aerials, historic sampling locations and analytical findings, as well as test pit and boring locations and findings, this office does not agree in entirety with the revised boundaries as shown on Figure C1, Appendix C of the January 2016 Landfill Boundary Refinement and Methane Gas Survey Report/or Nine Landfills.*

- *M4TP21 & M4TP22 - As previously indicated, debris of "de minimus" quantity must be addressed. The material should be either be pulled into the area deemed "landfill", or the boundary extended to ensure all material is encompassed. These test pits are of particular note, as they are at the 2015 eastern boundary on Figure C-1, used to support/designate boundary determination to the east, while being noted as containing some ash at 18-24" (M4TP21) and some pieces of concrete in the upper 18" (M4TP22).*
- *M4TP8, M4TP16 & M4TP17 - Although listed on Table C1 as "no solid waste observed; not landfill", and used on Figure C1 to support/designate boundary determinations, test pit field logs for these locations indicate the presence of limited amounts of debris/solid waste. M4TP17 is also located very close to 2010 Landfill*

Trench 5, which exhibited concrete and asphalt from 2-8'.

- *TP-7 included concrete in the upper 3', according to the trench log, and should not be designated as "Landfill Solid Waste Not Present", nor used to designate the boundary determination to the east.*
- *B-12 – As noted when comparing Parsons' May 2014 Figure 2.1 to Figure C1 of the referenced submittal, boring location B-12 appears to be located beyond the 2015 revised boundary. Concrete, however, was noted in the boring log as present from 29-36".*
- *B-55 – The boring location was found to contain elevated levels of pesticides; it appears to be located within the 2015 Revised Boundary, however, please confirm.*
- *B-12 & B-34 – It is unclear whether B-34 is located within the FTMM-04 2015 Revised Boundary, while it appears location B-12 falls south of and beyond the 2015 Revised Boundary. As all previously noted exceedances must be included in that area to be remediated via engineering controls, and elevated levels of metals were found at each of these locations, please clarify.*

Finally, a review of historic aerial photographs appear to indicate North Drive was repositioned at some point between 1995 and 2002 along the northern side of the landfill, its revised position situated further south as it approaches Wilson Avenue from the west. This is of particular note as inadequate confirmation of the northern landfill boundary has currently been submitted (M4TP16, M4TP17/TP5), nor does existing analytical data confine delineation of all COCs in that direction. Although additional sampling is not necessary at this time, additional confirmation of the northern boundary FTMM-4 is required.

RESPONSE: The proposed remedy as described in the July 2014 FTMM-04 Remedial Investigation Report (RIR) remains the same, and contaminants of concern will be addressed via the NJDEP Site Remediation Program (SRP) policy that allows for contaminants with appropriate institutional and engineering controls to be non-permanently remediated as long as the remedy is found to be protective of human health and the environment.

Institutional controls (i.e. deed notice) will be implemented at FTMM-04 to maintain the soil cover and prevent residential land use, and will also address soil concentrations that are above their respective NJDEP residential direct contact soil remediation standards (RDCSRS). Engineering controls (i.e. a cap) will also be implemented at FTMM-04 to address safety concerns and to protect non-residents from future exposure to solid waste at the landfill. A secondary benefit of the cap will be to prevent future exposure of soil concentrations above their respective NJDEP non-residential direct contact soil remediation standards (NRDCSRS). The applicable controls (institutional and/or engineering) will be applied based on the level of contamination.

Test pits M4TP21, M4TP22, M4TP8, M4TP16, M4TP17, TP-7, and boring B-12 were observed to contain debris of a scattered nature and or *de minimus* quantity at various depths. FTMM does not believe it is appropriate to expand the landfill boundary based on the observed scatter and or *de minimus* debris. However, FTMM will either delineate and excavate the material

contained in these test pits and soil borings and relocate it within the proposed landfill boundaries, or extend the proposed cap to include this material under the proposed engineering control landfill cover.

Boring B-55 contained no debris but had pesticide concentrations greater than the RDCSRS only, therefore, it is covered by the conditions of the institutional control that will be implemented at FTMM-04.

Borings B-12 and B-34 had contaminant concentrations greater than the RDCSRS and NRDCSRS. B-12 is located south of the 2015 Revised Boundary, and B-34 is located inside the boundary. FTMM will either delineate and excavate the soil with concentrations greater than the NRDCSRS contained in these soil borings and relocate it within the proposed landfill boundaries (and cap), or extend the proposed cap to include the soil with these concentrations above the NRDCSRS under the proposed engineering control landfill cover.

Landfill boundaries are based on the presence of landfill waste, and not based on the presence of soil contamination. The presence of landfill material and soil contamination are two separate issues; contamination alone does not define landfill boundaries. The solid waste regulations (N.J.A.C. 7:26-1.4) define a landfill as a solid waste facility or sanitary landfill, at which solid waste is deposited on or into the land as fill for the purpose of permanent disposal or storage for a period of time exceeding six months. However, there may be synergies when it comes to a remedy (i.e., a cap), as both landfill material and soil concentrations above the NRDCSRS require an engineering control (e.g., cap), whereas soil above a RDCSRS requires only an institutional control (deed notice).

The FTMM team reviewed aerial photographs for FTMM-04 and concurs that North Drive was repositioned along the northern side of the landfill. Based on the aerial photographs, North Drive is currently positioned farther south near its intersection with Wilson Avenue (a change that occurred between 1995 and 2002 based on Google Earth imagery). As a comparison, an aerial photograph from 1969 is included as **Attachment 1** and an aerial photograph from 2016 is included as **Attachment 2**.

Landfill FTMM-04 has been inactive since 1956. Since the repositioning of North Drive occurred subsequent to the closing of FTMM-04, the current location of North Drive covers the northern portion of FTMM-04 and does not impact the landfill boundaries. FTMM believes that the existing information (test pits 6, M4TP16, and M4TP17) confirms the northern extent of landfill material at FTMM-04 and additional confirmation of the northern boundary is not required.

However, to address the NJDEP concerns about debris of a scattered nature and or *de minimus* quantity at various depths east of Mill Creek at the northern boundary of the FTMM-04 landfill, the engineered soil cap will either be extended to North Drive to ensure that this location is included as part of the soil cover engineering control design or the soil associated with the test pits and boring location will be over excavated to the native material and the excavated soil relocated within the landfill boundaries. The landfill boundary in this area will not be revised; however,

the proposed engineering control (cap) may be extended beyond the landfill boundary to cover the debris.

In addition, FTMM believes North Drive acts as an equivalent cap in this area. The FTMM team is currently working with the Fort Monmouth Economic Redevelopment Authority (FMERA) to identify landfills where a functional *equivalent* (e.g., expanded parking lot) maybe installed rather than the vegetated soil cover. Information on the proposed landfill cover design including those landfills where a functional equivalent cover maybe installed will be presented in the *Draft Conceptual Design Report for Nine Landfills*. It is anticipated that this report will be submitted to the NJDEP after approval of the nine RIR FTMM landfill reports, and the *Landfill Boundary Refinement and Methane Gas Survey Report for Nine Landfills*.

We look forward to your review of these responses and approval of the FTMM-04 portion of the *Landfill Boundary Refinement and Methane Gas Survey Report for Nine Landfills*. Should you have any questions or require additional information, please contact me by phone at (732) 380-7064 or by email at william.r.colvin18.civ@mail.mil.

Sincerely,



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

Attachments – Attachment 1 – FTMM-04 Aerial Photograph from 1969
Attachment 2 – FTMM-04 Aerial Photograph from 2016

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

Attachment 1 – FTMM-04 Aerial Photograph from 1969

Attachment 1

FTMM-04 Aerial Photograph from 1969

Source (Date): USGS (1969-11-26 - 1969-12-13)

Obtained from <http://www.historicaerials.com>



Old North
Drive
(Pre-1995)

North Drive
(post-1995)

Mill Creek

FTMM-04

FTMM-04

FTMM-04

Attachment 2 – FTMM-04 Aerial Photograph from 2016

Attachment 2

FTMM-04 Aerial Photograph from 2016

Source (Date): Google Earth (2016-11-28)

Obtained from Google Earth



Old North Drive
(Pre-1995)

North Drive
(post-1995)

Mill Creek

FTMM-04

FTMM-04

FTMM-04