



DEPARTMENT OF THE ARMY

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May 10, 2016

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: Response to NJDEP's February 4, 2016 Comments on the December 2015 *Final Groundwater Sampling Report – First and Second Quarters 2015 – FTMM-22, FTMM-53 and FTMM-68 for Fort Monmouth, New Jersey*
PI # G000000032
Activity Number: RPC000001

Dear Ms. Range:

Fort Monmouth (FTMM) and Parsons have reviewed the New Jersey Department of Environmental Protection (NJDEP) comments on the Final Groundwater Sampling Reports – First Quarter 2015 and Second Quarter 2015 FTMM-22, FTMM-53 and FTMM-68 as documented in your letter dated February 4, 2016. Responses to your comments are provided below in the order in which they were presented in the comment letter.

A. FTMM-22 / Lime Pit

A. COMMENT: Ground water samples from FTMM-22 (Lime Pit) wells exceeded the Ground Water Quality Standards (GWQS) for TCE, which is consistent with historical sampling results. TCE concentrations have been increasing in deep well CW1MW281, increasing from 14 ppb in May 2014 to 250 ppb in March 2015, and 300 ppb in June 2015. Therefore, ground water sampling will be required for deep well CW1MW40, located hydraulically downgradient of CW1MW281, commencing immediately (the next scheduled quarterly sampling).

A. RESPONSE: Currently the remedial investigation (RI) report for FTMM-22 is in the process of being completed by the Army and subsequently will be submitted to the NJDEP for review. In the meantime, FTMM will temporarily suspend the long-term monitoring program (LTMP) for groundwater at FTMM-22 beginning in the first quarter of 2016. The reason is because the collective RI data for FTMM-22 already provides a good characterization of the concentrations of constituents in groundwater and allows for the evaluation of the groundwater data as a whole. Since the RI process is ongoing, there is minimal benefit to continuing the LTMP while characterization of the site is being completed. This approach was approved in a letter from the NJDEP dated March 16, 2016. Once the RI is complete and accepted by the NJDEP, a revised LTMP for the groundwater will be submitted for FTMM-22 and include the sampling of monitoring well CW1MW40.

B. FTMM-53 / Former Gas Station

B1. COMMENT: Ground water samples from FTMM-53 (Former Gas Station) wells exceed the GWQS for benzene, 1,2,4-Trimethylbenzene, 1,3,5-Trimethylbenzene, benzene, xylenes and VOC TICs in the 1st quarter sampling event however during the 2nd quarter event, benzene and TCE were the only exceedances.

Ground water contaminant concentrations in well 699RW05 (i.e. 6107 ppb total VOCs) for the March 2015 sampling event are significantly higher than the results for the June 2015 sampling event (i.e. 19 ppb total VOCs). Please include an explanation for the difference when submitting results of the field work performed in November of 2015.

B2. RESPONSE: FTMM will temporarily suspend the LTMP for groundwater at FTMM-53 beginning in the first quarter of 2016. The collective RI data for FTMM-53 provides a good characterization of the concentrations of constituents in groundwater and allows for the evaluation of the groundwater data as a whole. Since the RI process is ongoing there is minimal benefit to continue the LTMP while characterization of the site is being completed. Once the RI is complete and accepted by the NJDEP, a revised LTMP for the groundwater will be submitted for FTMM-53. This approach was approved in a letter from the NJDEP dated March 16, 2016. The significantly higher concentrations noted above for March 2015 will be addressed in the RI report for FTMM-53.

C. USTs FTMM-68 I Former Dry Cleaners

C1. COMMENT: Ground water samples from the wells exceeded the GWQS for PCE, TCE and vinyl chloride, consistent with historical sampling results.

Future sampling reports for the FTMM-68 site must include ground water contour maps constructed from ground water elevation data obtained from wells within and in the vicinity of the site.

C1. RESPONSE: FTMM-68 is currently in the RI phase with the initial field work investigation recently completed in December 2015. At the time of the data collection for the quarterly 2015 reports the only two existing onsite wells (565MW01 and 565MW01D) had not been surveyed. The two wells were surveyed December 2015 and the new survey data along with additional groundwater elevation points and groundwater contour maps will be incorporated into the Annual (Fourth Quarter) 2015 Report. In addition, wells installed at nearby FTMM-53 and wells installed to the east will be used to evaluate groundwater flow directions and chemistry, including VOC, at FTMM-68 in the RI report for FTMM-68.

C2. COMMENT: Comments were previously provided regarding the use of PDBS at this site, which indicated the PDBS for long-term monitoring would be acceptable if low-flow sampling was conducted concurrently once or twice for comparison. Low-flow sampling has not been conducted at this site. Future sampling must include low-flow sampling conducted concurrently with PDBS for a minimum of one to two quarters.

C2. RESPONSE: Comparison of low-flow purge and sampling (LFPS) and Passive Diffusion Bags (PDB) sampling at FTMM-68 has not been conducted since the NJDEP agreed in their February 5, 2015 letter to postpone this sampling until the site was fully characterized. The initial field work investigation at FTMM-68 was completed in December 2015. Sampling of existing and newly installed wells was performed using the LFPS method. VOC analyses were included for groundwater characterization. The RI data are being reviewed and in the meantime FTMM will temporarily suspend the LTMP for FTMM-68, approved in a letter from the NJDEP dated March 16, 2016. The collective RI data provides a good

characterization of the concentrations of constituents in groundwater at the site and since the RI is ongoing there is minimal benefit to continue the LTMP while characterization of the site is being completed. Once the RI is complete and accepted by the NJDEP, a revised LTMP will be submitted that will include conducting LFPS and PDB sampling concurrently for one quarter.

C3. COMMENT: The chlorinated VOC contamination beneath the FTMM-68 site has been confirmed in shallow well 565MW01 and deep well 565MW01D. Contamination must be horizontally and vertically delineated.

C3. RESPONSE: Agreed, see Response to Comments C1 and C2.

Should you have any questions or require additional information, please contact me at (732) 380-7064 or by email at william.r.colvin18.civ@mail.mil.

Sincerely,



William R. Colvin, PMP, CHMM, PG
BRAC Environmental Coordinator
OACSIM – U.S. Army Fort Monmouth

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)



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 Groundwater Reports - First and Second Quarters 2015 FTMM-22, FTMM-53 and FTMM-68"

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: _____
 Mailing Address: P.O. Box 148
 City/Town: Oceanport State: NJ Zip Code: 07757
 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: *William R. Colvin* Date: 5/10/2016

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