



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION
Site Remediation and Waste Management Program
BUREAU OF FIELD OPERATIONS
7 RIDGEDALE AVENUE
Cedar Knolls, New Jersey 07927

PHIL MURPHY
Governor

CATHERINE R. McCABE
Commissioner

SHEILA OLIVER
Lt. Governor

June 19, 2018

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

Re: FTMM – 66 (Building 886) Supplement to Summary Remedial Investigation Report and Request for No Further Action Approval (RIR)
Fort Monmouth, Oceanport, Monmouth County
Preferred ID: G000000032

Dear Mr. Colvin:

The New Jersey Department of Environmental Protection (Department) has completed review of the RIR for FTMM-66 (Building 886). Based on the review, the Department cannot approve the request for a No Further Action determination submitted by the Department of Army. The Department offers the following comments.

The RIR indicates that the most recent soil sampling data (November 2017) exhibited extractible petroleum hydrocarbons (EPH) at concentrations greater than the free/residual product limit of 8,000 mg/kg at four locations. EPH was detected at concentrations greater than the Residential Direct Contact Soil Remediation Standard (RDCSRS) of 5,100 mg/kg at one additional location. Furthermore, two samples exhibited exceedance of Impact to groundwater (IGW) for 2-methylnaphthalene. The Department acknowledges that petroleum hydrocarbon concentrations have decreased in soil in the last 15 years and that the said concentrations may continue to decrease over time. The Department of Army also attempted free product recovery (2003-2004) in which no free product was recovered. With this supplemental information, the Department of Army has proposed compliance averaging to meet the RDCSRS.

Please note that the 8,000 mg/kg EPH product limit soil remediation criterion is partly meant to be protective of ground water, but is not governed by whether or not there is free product on ground water or even a sheen. The Department does not use ground water data to establish presence or absence of EPH product in soil. N.J.A.C. 7:26E-5.1(e) states that "The person responsible for

conducting the remediation shall treat or remove free product and residual product to the extent practicable or contain free product and residual product when treatment or removal is not practicable. Monitored natural attenuation of free product and residual product is prohibited.” Please note that this citation includes residual product. EPH concentration in soil in exceedance of the applicable limit cannot be compliance averaged to attain compliance with product remediation; Category 1 EPH soil contamination in exceedance of 8,000 mg/kg must be delineated pursuant to N.J.A.C. 7:26E-4 and treated or removed to the extent practicable. Similarly, in 2017, the Department provided comments in an email stating that soils above 8,000 mg/kg are to be actively remediated.

If it is determined to be impracticable to remediate EPH to the applicable product limit then documentation is required to show why it is not practicable to remediate the exceedance(s) of EPH product limit; to record the EPH product exceedance(s) in a deed notice; to specify how the EPH product will be contained including possible establishment of engineering control(s). The RIR notes that product recovery was attempted, however, there is no indication that any effort has been made to treat the fuel oil contaminated soils over the past 15 years.

If Category 1 EPH in soil is delineated horizontally and vertically (pursuant to N.J.A.C. 7:26E-4), and if the Department of Army adequately documents technical impracticability to remediating the Category 1 EPH product, then the remaining concentration in exceedance of the 8,000 mg/kg product limit in soil can be compliance averaged for the purpose of meeting the applicable health-based soils remediation criteria. Please note that this can be done for Category 1 only because there are established criteria (5,100 mg/kg residential; 54,000 mg/kg non-residential). Compliance averaging cannot be conducted for Category 2 EPH because each EPH value is “sample-specific”.

Thank you and please feel free to contact me if you have any questions.

Sincerely,



A.J. Joshi

C: Jim Moore, BRAC Project Manager
Cristina Grill, Parsons
Kent Friesen, Parsons
Joe Fallon, FMERA
File