



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION
PUBLICLY FUNDED REMEDIATION ELEMENT
P.O. BOX 413
TRENTON, NJ 08625-0413

JON S. CORZINE
Governor

LISA P. JACKSON
Commissioner

June 24, 2008

Mr. Joseph Fallon, CHMM
Directorate of Public Works
ATTN: IMNE-MON-PWE
167 Riverside Ave.
Fort Monmouth, NJ 07703

RE: Remedial Investigation Report and CEA Information
Site 108 – Main Post
Fort Monmouth, NJ

Dear Mr. Fallon:

The NJDEP Site Remediation Program (SRP) has completed its review of the report titled "Remedial Investigation Report, Site 108", dated August 13, 2004, by Versar Inc. We have also reviewed the Classification Exception Area (CEA) Information for Site 108 that is included in the report titled "Classification Exception Area Information for Various Sites", dated July 12, 2004 by Versar. Our comments are attached.

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,

Larry Quinn, P.E., CHMM, Site Manager
Bureau of Investigation, Design and Construction

Attachment

NJDEP COMMENTS ON
RI REPORT and CEA INFORMATION for SITE 108
FORT MONMOUTH, NJ

RI Report

1. Arsenic in Soil. The Executive Summary and Section 5.3 state that arsenic was detected in 8 of 9 soil boring locations at concentrations greater than the RDCSCC and that the arsenic is likely attributable to the native soil characteristics or a non-point source distributed throughout the subsurface soils at Site 108. Historic fill should be cited as a likely reason for the arsenic found in soil samples. However, the arsenic levels do constitute a direct contact threat, so at a minimum the Army must propose institutional or engineering controls, and a deed notice. Paving would constitute an acceptable engineering control, but a deed notice would still be required.
2. Figures – General. All detailed site figures must show the former locations of the USTs, piping, and dispenser area. At least one Figure must show those items and the location of all soil borings, post-excavation soil samples, and monitoring wells.
3. Ground Water - General.
 - a) The existing monitoring wells cannot adequately monitor potential ground water impacts at Site 108, and thus the remedial investigation of ground water isn't complete. Ground water samples must be collected from beneath the former UST #64, at the locations of borings S-5 and S-7 (where the IGWSCC for benzene was exceeded), and within 10 feet hydraulically downgradient of the former UST piping and dispenser area. NJDEP recommends the use of temporary well points initially. Ground water samples should be analyzed for VO+10 and BN+15.
 - b) Based on comment a) above, NJDEP cannot concur with the conclusion that arsenic is the only ground water contaminant of concern at Site 108.
4. Section 3.2 (Sample Collection Activities): The report states that sampling and decontamination procedures were conducted in accordance with the December 1997 Fort Monmouth Standard Sampling Operating Procedure. All future sampling procedures and equipment decontamination must be conducted pursuant to the most recent version of the NJDEP Field Sampling Procedures Manual per the requirements of N.J.A.C. 7:26E-4.4(d).

NJDEP COMMENTS ON
RI REPORT and CEA INFORMATION for SITE 108
FORT MONMOUTH, NJ (continued)

5. Section 7.0. This section recommends no further action (NFA) for arsenic in ground water. The Department acknowledges the results of the fate and transport modeling for arsenic. However, an NFA determination is not acceptable. The Army needs to request approval for a natural ground water remediation remedy, together with the proposed Classification Exception Area (CEA), as detailed in 7:26E-6.3(d) and (e).
6. Ground Water Contour Maps: For future reference, the Contour Map Reporting Form found in Appendix G of the Technical Requirements must be completed and submitted for each ground water contour map included in reports.

CEA Information Report

1. Since the NJDEP has determined that a RI of ground water hasn't been completed, the CEA proposal can't be evaluated now. A revised CEA proposal should be submitted after additional RI work is completed and submitted to NJDEP.
2. The current and projected use of ground water in the proposed CEA must be addressed in the revised CEA proposal.