



State of New Jersey

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BOB MARTIN
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Lt. Governor

August 9, 2016

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

Re: *Final Remedial Investigation Report for FTMM-18* dated October 2015
(*& Landfill Boundary Refinement - for FTMM-18 only - dated January 2016*)
Fort Monmouth
Oceanport, Monmouth County
PI G000000032

Dear Mr. Colvin:

The New Jersey Department of Environmental Protection (Department) has performed a review of the referenced Remedial Investigation Report, received on October 8, 2015. The review did not include an evaluation of the Risk Assessment, but did include an assessment of the boundary modification information applicable to FTMM-18 provided in Section 2.1 and Appendix H FTMM-18 of the January 2016 *Landfill Boundary Refinement and Methane Gas Survey Report for Nine Landfills*; comments generated from said review are included. Comments regarding the Methane Gas Survey portion of that document were previously provided; see the Department's correspondence dated April 20, 2016, which described additional methane monitoring requirements. Comments relative to the Remedial Investigation (RI) as well as the landfill boundary refinement efforts are as follows:

Soil Analytical Results

Elevated levels of PAHs and priority pollutant metals have been noted, however, contaminants of concern are to be addressed via engineering and institutional controls. Addressing all known levels of contamination in this manner is acceptable pending compliance with comments as noted below. If areas of obvious and/or significant contamination are encountered during the landfill preparation or capping activities, it is possible additional hot spot removal may be necessary.

As has been previously discussed, all historically noted sample locations containing elevated levels of contamination are to be addressed via engineering and institutional controls (none may

remain beyond the area undergoing capping). Figure 2-1 of the submittal displays historic boring locations relative to the 2015 revised boundary. A review of analytical data appears to confirm locations with elevated concentrations are located within the 2015 revised boundary. The cap must adequately include affected soil in the areas of B28, B34, and in particular B31, which exhibited elevated levels of PAHs while appearing to be located very close to and/or immediately adjacent to the designated southern boundary near Building 293 on Figure 2.1.

Landfill Boundary

Based upon reviews of the historic aerials, historic sampling locations and analytical findings, as well as test pit and boring locations and findings, the boundary as noted in Figure H1 of the January 2016 *Landfill Boundary Refinement and Methane Gas Survey Report for Nine Landfills* appears to adequately encompass the extent of known contamination and landfilled material at FTMM-18, with the following exceptions.

Although located within the 2015 Revised Boundary of the landfill, Figure H1 of the Landfill Boundary Refinement submittal represents boring and test pit locations 6A, 7, 7A, 8 and 8A as “solid waste not present”. The logs for those test pits and borings, however, found in Appendix A/Appendix A of the RIR, indicate landfill material was present (concrete and asphalt were encountered from 1-2’ at location 6A; concrete, asphalt and scrap metal from 2-4’ at location 7).

M18TP10, based upon the test pit field log found in the *Landfill Boundary Refinement* submittal which references waste material including ash, coal and asphalt from 1-4’, is shown on Figure H1 of the Landfill Boundary Refinement submittal as lying beyond the landfill boundary. Please explain why the boundary should not be expanded to include this area.

Two issues are noted with test pit M18TP14. The field log for test pit M18TP14 (and M18TP16 as well) indicates “no waste”, however, the log references minimum or surface debris including glass and plastic bottles, and lumber. As has been discussed, the Department does not agree “minimum debris” exempts an area from consideration as landfill. M18TP14 and M18TP16 are (marginally) located within the boundary as noted in Figure H1, however, any such debris located beyond the noted “boundary” must also be addressed either via extension of the engineering controls (cap) to those areas, or by incorporating the material into that area to be capped (e.g moving the material back into that area to be capped). Additionally, the log for M18TP14 includes a location sketch which appears to indicate MW25 is in the immediate area, rather than M18MW22. Please clarify.

Proposed Remedy

The landfill is to be cleared, regraded, and covered with a vegetated two foot cap of clean soil. A vegetated soil cover of two feet of clean fill, and the implementation of a LUC through the filing of a deed notice with its incumbent inspection and reporting requirements, was previously deemed appropriate and is acceptable.

It is anticipated a CEA will be established, to remain in place until NJDEP Ground Water Quality Standards are achieved at FTMM-18. The use of the term “residential” user, within the submittal’s discussion as to the intent of a CEA, however, is not accurate. As you are aware, CEAs are established in order to provide notice that the constituent standards for a given aquifer classification are not or will not be met in a localized area due to natural water quality or anthropogenic influences, and that designated aquifer uses are suspended in the affected area for the term of the CEA. The Department shall restrict or require the restriction of potable ground water uses within any Classification Exception Area where there is or will be an exceedance of the Primary Drinking Water Quality Standards. The intent of such Departmental action is to ensure that the uses of the aquifer are restricted until standards are achieved

Miscellaneous

As previously discussed with the Army, the Department did not approve the site-wide background soil or ground water quality investigations referenced in the submittal, e.g. the Weston 1995 Background Investigation or 2011 Brinkerhoff Background Metals Evaluation.

Please contact this office with any questions.

Sincerely,



Linda S. Range

- C: Joe Pearson, Calibre
- James Moore, USACE
- Rick Harrison, FMERA
- Joe Fallon, FMERA
- Ann Charles, BEERA
- Daryl Clark, BGWPA