



## State of New Jersey

CHRIS CHRISTIE  
Governor

DEPARTMENT OF ENVIRONMENTAL PROTECTION  
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BOB MARTIN  
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Lt. Governor

July 11, 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-14* dated July 2015  
(*& Landfill Boundary Refinement - for FTMM-14 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 July 2, 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-14 provided in Section 2.1 and Appendix G FTMM-14 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, priority pollutant metals and pesticides (DDT) 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; a review of analytical data appears to confirm all locations with elevated concentrations are located within the 2015 revised boundary (this should have been reflected on a map).

### **Landfill Boundary**

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, the boundary as noted in Figure G1 of the January 2016 *Landfill Boundary Refinement and Methane Gas Survey Report for Nine Landfills* submittal appears to adequately encompass the extent of known contamination and landfilled material at FTMM-14, with the possible exception of test pit M14TP17 along the noted northern boundary. The field log for M14TP17 indicates the presence of some concrete and asphalt from 0-4', which could be indicative of landfill material. As such, the boundary should be moved north in this area, or the material pulled into the area deemed "landfill", unless information is submitted which sufficiently documents why this material should not be considered same.

### **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 filing of a deed notice with its incumbent inspection and reporting requirements, was previously deemed appropriate and is acceptable.

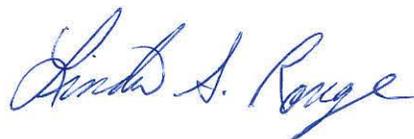
### **Miscellaneous**

The Department agreed in July of 2014 with the recommendation to discontinue the long term ground water monitoring at FTMM-14.

As previously discussed with the Army, although AOC or parcel specific investigations have confirmed the presence of naturally occurring levels of metals at specific areas of the site, 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,

A handwritten signature in blue ink that reads "Linda S. Range". The signature is written in a cursive style with a large initial "L".

Linda S. Range

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