



State of New Jersey

CHRIS CHRISTIE
Governor

DEPARTMENT OF ENVIRONMENTAL PROTECTION
Bureau of Case Management
401 East State Street
P.O. Box 420/Mail Code 401-05F
Trenton, NJ 08625-0028
Phone #: 609-633-1455
Fax #: 609-633-1439

BOB MARTIN
Commissioner

KIM GUADAGNO
Lt. Governor

August 22, 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-5* dated October 2015
(*& Landfill Boundary Refinement - for FTMM-5 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 23, 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-5 provided in Section 2.1 and Appendix D FTMM-5 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, pesticides, priority pollutant metals, VOs (PCE at 5 ppm), and a single exceedance of PCBs (at 1.499 ppm) 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).

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 D1 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-5, with the following exception.

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, with the possible exception of contamination associated with location B-254. As both pesticide and PAH exceedances are present at this location, it appears the 2015 boundary as indicated on Figure 2.1 may be too close to the boring location to ensure contamination is contained within the boundary. It is therefore recommended the boundary be moved slightly south of location B-254.

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-5. The use of the term "residential" user, within the submittal's discussion as to the intent of a CEA, however, is not accurate. 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,

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

Linda S. Range

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