



State of New Jersey

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September 22, 2016

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

Re: *Final Landfill Boundary Refinement – for FTMM-04 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 submittal, received on January 19, 2016. As previously confirmed in the November 18, 2014 comment letter on the RI/FS for FTMM-04, performance of a methane gas survey was required, and additional boundary delineation efforts were to be undertaken. Comments regarding the methane gas survey subsequently performed were provided in the Department's correspondence dated April 20, 2016; comments to the boundary refinement efforts performed at FTMM-04 as documented in the referenced submittal are as follows.

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, this office does not agree in entirety with the revised boundaries as shown on Figure C1, Appendix C of the January 2016 *Landfill Boundary Refinement and Methane Gas Survey Report for Nine Landfills*.

- M4TP21 & M4TP22 - As previously indicated, debris of "de minimus" quantity must be addressed. The material should be either be pulled into the area deemed "landfill", or the boundary extended to ensure all material is encompassed. These test pits are of particular note, as they are at the 2015 eastern boundary on Figure C-1, used to support/designate boundary determination to the east, while being noted as containing some ash at 18-24" (M4TP21) and some pieces of concrete in the upper 18" (M4TP22).
- M4TP8, M4TP16 & M4TP17 - Although listed on Table C1 as "no solid waste observed; not landfill", and used on Figure C1 to support/designate boundary determinations, test

pit field logs for these locations indicate the presence of limited amounts of debris/solid waste. M4TP17 is also located very close to 2010 Landfill Trench 5, which exhibited concrete and asphalt from 2-8'.

- TP-7 included concrete in the upper 3', according to the trench log, and should not be designated as "Landfill Solid Waste Not Present", nor used to designate the boundary determination to the east.
- B-12 – As noted when comparing Parsons' May 2014 Figure 2.1 to Figure C1 of the referenced submittal, boring location B-12 appears to be located beyond the 2015 revised boundary. Concrete, however, was noted in the boring log as present from 29-36".
- B-55 – The boring location was found to contain elevated levels of pesticides; it appears to be located within the 2015 Revised Boundary, however, please confirm.
- B-12 & B-34 – It is unclear whether B-34 is located within the FTMM-04 2015 Revised Boundary, while it appears location B-12 falls south of and beyond the 2015 Revised Boundary. As all previously noted exceedances must be included in that area to be remediated via engineering controls, and elevated levels of metals were found at each of these locations, please clarify.

Finally, a review of historic aerial photographs appear to indicate North Drive was repositioned at some point between 1995 and 2002 along the northern side of the landfill, its revised position situated further south as it approaches Wilson Avenue from the west. This is of particular note as inadequate confirmation of the northern landfill boundary has currently been submitted (M4TP16, M4TP17/TP5), nor does existing analytical data confirm delineation of all COCs in that direction. Although additional sampling is not necessary at this time, additional confirmation of the northern boundary FTMM-4 is required.

Please contact this office with any questions.

Sincerely,



Linda S. Range

C: Joe Pearson, Calibre
James Moore, USACE
Rick Harrison, FMERA
Joe Fallon, FMERA