



State of New Jersey

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BOB MARTIN
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June 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-03* dated February 2016
(*& Landfill Boundary Refinement for FTMM-03 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 report, received on February 19, 2016. The review did not include an evaluation of the Risk Assessment, but did include an assessment of the boundary modification information applicable to FTMM-03 provided in Section 2.1 and Appendix B FTMM-03 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 Feasibility Study (RI) as well as the landfill boundary refinement efforts are as follows:

Soil Analytical Results

Elevated levels of VOs, pesticides, priority pollutant metals, PAHs, and PCBs have been noted in the soil. Levels of PCBs have been found which are to undergo additional confirmatory delineation efforts, see below, however, contaminants of concern are to be addressed via engineering and institutional controls. Addressing all known remaining 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 discussed, all previously 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 all historic boring locations, and appears to confirm all are located within the noted FTMM-03 Landfill 2015 revised boundary.

PCBs

PCBs have been noted at several sample locations, centered near boring B-92, each below 25 mg/kg. A pre-design investigation (PDI) will be conducted to further delineate the extent of PCBs in soil to verify the concentrations do not exceed 25 mg/kg at the landfill, as appropriate. Any PCB soils found to be impacted above 25 mg/kg will require removal.

Landfill Boundary

This office does not agree in entirety with the boundaries as shown on Figure B1, Appendix B of the January 2016 *Landfill Boundary Refinement and Methane Gas Survey Report for Nine Landfills*, based upon findings in the test pit field logs (e.g. M3TP12 noted bricks and concrete from 2-4', while ash, concrete and rested metal was found at 1.5-4' at M3TP19). However, the FTMM-03 Landfill Revised Boundary (2015) as indicated in Figure 2.1 of the RI does appear acceptable based upon known information.

Proposed Remedy

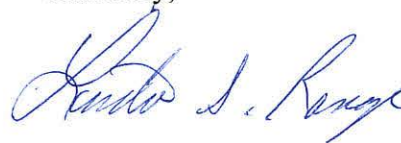
Following confirmation no PCBs above 25 mg/kg are present, the landfill is to be cleared, regraded, and covered with a vegetated (or functional equivalent) two foot cap of clean soil. A vegetated soil cover of two feet of clean fill, the implementation of a LUC through filing of a deed notice with its incumbent inspection and reporting requirements, was previously deemed appropriate and is acceptable. Although conceptually feasible, a "functional equivalent" in lieu of the vegetated layer must be proposed and reviewed for appropriateness once specifications are known, to ensure "functional equivalency".

Miscellaneous

As previously discussed, the Department has not approved the previously performed background soil and ground water quality investigations, i.e. the Weston 1995 Background Investigation and the Brinkerhoff Background Metals Evaluation which are referenced in the submittal.

Please contact this office with any questions.

Sincerely,



Linda S. Range

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