



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION
PUBLICLY FUNDED REMEDIATION ELEMENT
P.O. BOX 413
TRENTON, NJ 08625-0413

JON S. CORZINE
Governor

MARK N. MAURIELLO
Acting Commissioner

September 1, 2009

Ms. Wanda Green
BRAC Environmental Coordinator
Directorate of Public Works
ATTN: IMNE-MON-PWE
167 Riverside Ave.
Fort Monmouth, NJ 07703

RE: Draft Final Baseline Ecological Evaluation Work Plan
Fort Monmouth, NJ

Dear Ms. Green:

The NJDEP Site Remediation Program (SRP) has completed its review of the Draft Final Baseline Ecological Evaluation (BEE) Work Plan, dated July 2009, by Shaw Environmental, Inc. Our comments on the document are attached.

As you will see in the comments, we feel that a justification should be documented for the site remediation areas of concern (AOCs) that aren't proposed for inclusion in the BEE. Aside from that, the SRP is generally pleased with the Draft Final BEE Work Plan and the Army's initiative in conducting the BEE. The sampling and analyses that are proposed in the Draft Final BEE Work Plan go beyond the minimum requirements for a BEE. The resulting data will be useful in assessing the need for additional investigations and/or remedial actions at many of Fort Monmouth's AOCs.

You or your staff may contact me at 609-633-0766 with any questions on the enclosed comments, or any other site remediation matters at Fort Monmouth.

Sincerely,

Larry Quinn, P.E., Site Manager
Bureau of Investigation, Design and Construction

Attachment

NJDEP COMMENTS on DRAFT FINAL BEE WORKPLAN
FORT MONMOUTH, NJ

1. General. NJDEP wants to ensure that the BEE will assess all sites with the potential for impacts to ecological receptors. The fourth paragraph of Section 1.0 and the first paragraph of Section 3.0 discuss the total numbers of Installation Restoration Program (IRP) sites and Environmental Condition of Property (ECP) sites, and the number of sites included in the BEE. Table 3-1 lists the sites included in the BEE and Sections 3.1 and 3.2 discuss each included site in detail. However, the workplan contains no discussion of the areas of concern (AOCs) that aren't included in the planned BEE, some of which have or had the potential for impacts to ecological receptors (the Former Main Post Sewage Treatment Plant (FTMM-20) and Site CW-7 are two examples). To provide assurances that all necessary sites or AOCs will be addressed in the BEE, the BEE Workplan must include the following:
 - a) a list and summary of all (active and closed) IRP, underground storage tank (UST), and ECP sites, and
 - b) a brief technical justification for the non-inclusion of the IRP, UST, and ECP sites that are not included in the BEE.

2. Report References. The third paragraph of Section 3.1.8, Water Tank (M-15), states that a Remedial Action Report (RAR) was submitted to NJDEP in February 2007. Similarly, the third paragraph of Section 3.1.9, Pesticide Storage, Building 498 (M-16) states that an RAR was submitted to NJDEP. NJDEP has not received either of the referenced RARs.

3. Sediment Sampling. The sections listed below all end with the statement that "In order to facilitate the BEE, sediment and surface water sampling within...(the adjacent stream)...are recommended." However, the workplan doesn't include sediment sampling at these AOCs, because existing sediment data is to be used (Table 4-2). The narratives should be corrected.
 - 3.1.11 Building 1122, Unknown Discharge
 - 3.1.12 Building 283, Leaking UST, Gasoline
 - 3.1.14 Buildings 283, 288, 291, 292, 293, 295 (ECP Parcel 49)
 - 3.1.15 Building 1075 (ECP Parcel 61)
 - 3.1.16 Building 900 (ECP Parcel 69)
 - 3.2.3 Building 2700 (ECP Parcel 15)
 - 3.2.4 Buildings 2507 and 2704 (ECP Parcel 27)
 - 3.2.5 Building 2525 (ECP Parcel 28)