



State of New Jersey

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

JON S. CORZINE
Governor

LISA P. JACKSON
Commissioner

CA - All COC (less of criteria) must be a COC in RI + CEA

- Ties

- GW Contour Form.

- Current + future water use.

April 29, 2008

Mr. Joseph Fallon, CHMM
Directorate of Public Works
ATTN: IMNE-MON-PWE
167 Riverside Ave.
Fort Monmouth, NJ 07703

RE: Remedial Investigation Report and CEA Information
Site 80/166 - Main Post
Fort Monmouth, NJ

Dear Mr. Fallon:

The NJDEP Division of Remediation Management & Response (DRMR) has completed its review of the report titled "Remedial Investigation Report, Site 80/166", dated January 4, 2005, by Versar Inc. We have also reviewed the Classification Exception Area (CEA) Information for Site 80/166 that is included in the report titled "Classification Exception Area Information for Various Sites", dated July 12, 2004 by Versar. Our comments are attached.

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., CHMM, Site Manager
Bureau of Design and Construction

Attachment

NJDEP COMMENTS ON
RI REPORT and CEA INFORMATION for SITE 80/166
FORT MONMOUTH, NJ

RI Report

1. Soil. Based upon the information provided in the RIR, no further investigation of soil is required at Site 80/166.
2. Section 5.3: The statement the benzene is not a ground water contaminant of concern (COC) is not acceptable to the NJDEP. Benzene was detected above the New Jersey Ground Water Quality Criteria (GWQC) of 1.0 ug/l in ground water samples from one well and two geoprobe borings near the Building 80 tank excavation. Therefore, benzene must be a COC in the RIR. The fate and transport of benzene as a ground water contaminant must be determined. Benzene must also be included on all Figures as appropriate, including Figure 5.1.
3. Section 7.0. This section recommends no further action (NFA) for pesticides and metals in ground water. The Department acknowledges the results of the fate and transport modeling of those COCs. However, an NFA determination is not acceptable. The Army needs to request approval for a natural ground water remediation remedy, together with the proposed Classification Exception Area (CEA), as detailed in 7:26E-6.3(d) and (e). Also, based on comment #1, benzene must be included in the remedial proposal.
4. VOC TICs: The NJDEP Ground Water Quality Criteria for Volatile Organic Tentatively Identified Compounds (TICs) are as follows: 100 ppb for individual TICs, and 500 ppb for total TICs. Geoprobe boring #4 registered a slight exceedance of the Criteria with a reported 110 ppb of 2,3-Dihydro-1-methylindene. NJDEP isn't requiring any action, based upon downgradient geoprobe sample TICs, but this exceedance should be noted in the report and shown on Figure 5-2.
5. Section 3.0 (Site Activities): The report states that sampling and decontamination procedures were conducted in accordance with the December 1997 Fort Monmouth Standard Sampling Operating Procedure. All future sampling procedures and equipment decontamination must be conducted pursuant to the most recent version of the NJDEP Field Sampling Procedures Manual per the requirements of N.J.A.C. 7:26E-4.4(d).

NJDEP COMMENTS ON
RI REPORT and CEA INFORMATION for SITE 80/166
FORT MONMOUTH, NJ (continued)

6. Section 3.2 (Ground water Sample Collection Activities): The report is deficient pursuant to N.J.A.C. 7:26E-4.8(c)7. Information regarding the purging and sampling of the monitoring wells was not provided in the report. At a minimum, the purging and sampling information for the last 4 quarters of sampling must be submitted to NJDEP. The information should be submitted for all sampling events if available on compact disc.
7. Ground Water Contour Maps: For future reference, the Contour Map Reporting Form found in Appendix G of the Technical Requirements must be completed and submitted for each ground water contour map included in reports.
8. Figure 2-4. The scale on this figure (1"= 10') is incorrect.

CEA Information Report

1. Benzene. Benzene must be included in the CEA Proposal as a COC, and its fate and transport must be determined.
2. The current and projected use of ground water in the proposed CEA must be addressed.

Bc:

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