

Friesen, Kent

From: Range, Linda <Linda.Range@dep.nj.gov>
Sent: Tuesday, April 25, 2017 1:07 PM
To: Friesen, Kent
Cc: Moore, James T CIV USARMY CENAN (US); Grill, Cris
Subject: RE: M-66 - Summary Remedial Investigation Report & Request for No Further Action for Site FTMM-66

Hi Kent,

I agree, with original numbers as high those reported, it's possible soils at FTMM-66 may still exceed the 8,000 mg/kg residual product/free product "cap"/limit. We cannot consider soils with levels above 8,000 mg/kg for compliance averaging; according to the protocol/policy, etc,soils above 8,000 mg/kg are to be remediated (actively remediated). They are considered representative of at least residual product and therefore potential source material.

We can certainly discuss, but up to you whether you wish to go ahead to determine current conditions in hope that results below 8,000 ppm will allow for compliance averaging, or consider additional alternative action - excavation, etc.

From: Friesen, Kent [mailto:Kent.Friesen@parsons.com]
Sent: Monday, April 24, 2017 4:03 PM
To: Range, Linda <Linda.Range@dep.nj.gov>
Cc: Moore, James T CIV USARMY CENAN (US) <James.T.Moore@usace.army.mil>; Grill, Cris <Cris.Grill@parsons.com>
Subject: RE: M-66 - Summary Remedial Investigation Report & Request for No Further Action for Site FTMM-66

Hi Linda – Jim and I discussed this morning; based on your response we are looking at performing additional soil sampling at this site to support the claim of TPH/EPH degradation. But if we still exceed the 8,000 mg/kg EPH residual/free product limit, could the State consider further review of the compliance averaging approach, since the Army installed and operated a free produce recovery system?

It seems quite possible that this FTMM-66 site may exceed the 8,000 mg/kg free product limit, even though recoverable or mobile free product is no longer present. – Kent Friesen

Kent A. Friesen, P.E., P.G.

PARSONS

Fort Monmouth BRAC 05 Facility
P.O. Box 148
Oceanport, NJ 07757
Office: (732) 383-7201
Mobile: (307) 214-0324
Fax: (732) 383-8960
kent.friesen@parsons.com

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From: Range, Linda [mailto:Linda.Range@dep.nj.gov]
Sent: Monday, April 17, 2017 1:42 PM
To: william.r.colvin18.civ@mail.mil
Cc: Moore, James T NAN02 (James.T.Moore@usace.army.mil) <James.T.Moore@usace.army.mil>; Pearson, Joseph <Joseph.Pearson@calibresys.com>; Friesen, Kent <Kent.Friesen@parsons.com>
Subject: M-66 - Summary Remedial Investigation Report & Request for No Further Action for Site FTMM-66

Bill,

As you may recall, submittals incorporating use of the 95% UCL method for compliance averaging are referred to another group for review. In performing my preliminary review prior to referral, however, an issue was noted. As referenced in the submittal (2nd paragraph of Section 5.0, and as per my previous email of June 23, 2016)), DEP policy states TPH/EPH cannot exceed the residual product/free product limit of 8,000 mg EPH/kg for No. 2 fuel. Although it is agreed natural degradation has likely taken place in the intervening years since the 2003 post excavation data was generated, more recent sampling has not been performed to substantiate the extent to which natural degradation may have taken place, and the levels from '03 were significantly elevated (e.g. 24,876 ppm; 31,639 ppm).

After discussion with management, as no evidence has been provided to demonstrate EPH is now below 8,000 mg/kg, it was determined FTMM-66 is not eligible for compliance averaging and the submittal will not be referred for further review.

Please contact me to discuss further.

Linda S. Range
Site Remediation Program
Bureau of Case Management
609-984-6606