



## State of New Jersey

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Governor

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BOB MARTIN  
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December 16, 2016

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

Re: *No Further Action Request - Area Adjacent to Building 978 (Parcel 97)*  
Fort Monmouth  
Oceanport, Monmouth County  
PI G000000032

Dear Mr. Colvin:

The New Jersey Department of Environmental Protection (Department) has completed review of the referenced submittal relative to PCB contamination adjacent to Building 978, prepared by Tetra Tech, received on November 3, 2016, as well as subsequent information received on December 5, 2016. The Department's comments relative to the submittal are provided below.

### **PCBs in Soil**

It is agreed all PCB-impacted soil and concrete have been removed as confirmed by review of the above referenced information. No additional action is necessary as regarding PCBs in soil within Parcel 97.

### **PCBs in Ground Water**

The submittal posits PCBs exceedances previously noted in ground water, and collected prior to excavation of contaminated soils, were likely due to turbid samples, and were not representative of actual ground water conditions. Although it is possible turbidity may have been responsible for the elevated levels, confirmation of same is required. The proposal for No Further Action for ground water is, therefore, not acceptable at this time. A minimum of one ground water sampling event, at the locations where PCBs exceed the Ground Water Quality Standards

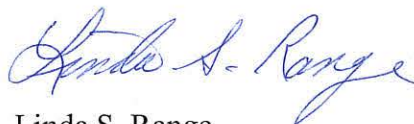
(GWQS) is to be conducted. A ground water sample is, therefore, required at location S043 and in the vicinity of SW033/S041 (these two samples were near enough to one another to be considered one location for this purpose). If sampling results are in compliance with the GWQS for PCBs, designation of NFA for the ground water will be appropriate.

## PAHs

Although it is agreed excavation activities removed all soils impacted by elevated levels of PCBs, it appears three sample locations remain which exhibit levels of PAHs above the Residential Direct Contact Soil Remediation Standards/Non-Residential Direct Contact Soil Remediation Standards (NRDCSRS/RDCSRS). Samples were collected and analyzed for EPH, with contingency sampling for PAH analyses, as appropriate. Although detected, no exceedances of EPH were noted. The additional information received on December 5<sup>th</sup> indicates the "areas of concern were conservatively excavated to depths of 3 to 5 ft as shown on Revised Figure 4", however, neither the original submittal nor the revised figure support removal of soils beyond the date of the Phase I post excavation sampling results for location SW031, and more particularly S001 and S006. Further action to address these PAH exceedances is required prior to receiving corroboration no additional action is necessary.

Please contact this office if you have any questions.

Sincerely,



Linda S. Range

C: William Colvin, BEC  
James Moore, USACE  
Rick Harrison, FMERA  
Joe Fallon, FMERA