



State of New Jersey

Christine Todd Whitman
Governor

Department of Environmental Protection

Robert C. Shinn, Jr.
Commissioner

Mr. James Ott
SELFM-EH-EV
Department of the Army
Headquarters CECOM Fort Monmouth
Fort Monmouth, NJ 077703-5000

SEP 21 1995

Dear Mr. Ott:

Re: UST Site Investigation Reports - August 1995
Fort Monmouth Army Base
Tinton Falls, Monmouth County

The NJDEP is in receipt of several Site Investigation Reports submitted by Smith Environmental Technologies Corporation for multiple UST removal and investigations being conducted at the Fort Monmouth Army Base in Tinton Falls. The reports were as follows:

Table with 3 columns: Building, Location, UST Registration Number. Rows include buildings 9099, 9332, 205, 208A, 209, 8003, 8004, 8005, 8006, and 2624 with their respective locations and UST numbers.

GENERAL COMMENTS:

QA/QC. The NJDEP and the Army have agreed that QA/QC would be conducted under Army scrutiny in a manner consistent with the Technical Requirements for Site Remediation (Tech Regs - N.J.A.C. 7:26E), specifically Subchapter 2, and NJDEP policy. These reports do not contain any information which notifies the NJDEP that the information provided has been QA/QC'd and is therefore accurate. Without this information, the NJDEP cannot approve of the documents submitted.

It was frequently unclear how many feet and how many samples were taken in the investigation of the UST associated piping. Future submittals should clearly state these facts and provide any reasoning for divergence from the Tech Regs.

SPECIFIC COMMENTS

The comments on these documents are referenced by the associated building number.

9332:

The major concerns with this report are regarding the ground water investigation. Monitor Well, MW-1, located downgradient of the site, has been found to have exceedences of lead and tetrachloroethene. The NJDEP has noted the distinct drop in these contaminant levels over the two

sampling rounds (September 1993 and November 1993) and we recommend that the monitor well should again be sampled to determine if the levels of contaminants have dropped below the GWQS. It has been further noted that several compounds which were sampled for were analyzed using equipment, analytical methodology or laboratory procedure which was not capable of quantitation levels which were lower than the GWQS. This is not acceptable. All future sample analysis must be performed using equipment and procedures with Method Detection levels at or below the corresponding GWQS.

Page 8, Section 2.4.1. Purge water may be disposed of on site as provided in the Field Sampling and Procedures Manual, dated May 1992 (Page 14).

Page 9, Section 3.2. Lead was detected in MW-1 at a concentration of 64 ug/l, not 3.8 ug/l as stated. Tetrachloroethene was detected at 3.8 ug/l. As discussed above, both were found in excess of the GWQS.

Appendix B, Page 3. Article VI should have been checked YES.

9099:

Please see the comment above regarding using equipment, analytical methodology and laboratory procedures to assure that the sample analysis quantitation levels are below the GWQS. As a result of quantitation levels being well above the GWQS, the NJDEP cannot accept the monitor well results submitted with this specific report. At a minimum of one additional ground water sample analysis must be performed on a sample of water taken from MW-1 at building 9099.

205:

Please explain why only 2 samples were taken along the 48 feet of UST piping. As per the Technical Requirements for Site Remediation (Tech Regs) - 7:26E-3.9.5(ii), one sample per 15 linear feet is required (up to 50 linear feet).

This report is acceptable provided this comment is appropriately addressed.

208A:

Please explain why no soil samples were taken along the 48 feet of UST piping. As per the Technical Requirements for Site Remediation (Tech Regs) - 7:26E-3.9.5(ii), one sample per 15 linear feet is required (up to 50 linear feet).

209:

No further comments.

8003:

No further comments.

8004:

No further comments.

8005:

No further comments.

8006:

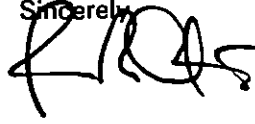
No further comments.

2624:

No further comments.

you should have any questions or require additional information, please do not hesitate to contact me at (609) 633-1455.

Sincerely,

A handwritten signature in black ink, appearing to read 'I.R.C.', written over the word 'Sincerely,'.

Ian R. Curtis, Case Manager
Bureau of Federal Case Management

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