



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

August 27, 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 1122 – Main Post
Fort Monmouth, NJ

Dear Mr. Fallon:

The NJDEP Site Remediation Program (SRP) has completed its review of the report titled "Remedial Investigation Report and Remedial Action Workplan, Site 1122", dated October 21, 2005, by Versar Inc. We have also reviewed the Classification Exception Area (CEA) Information for Site 1122 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 Investigation, Design and Construction

Attachment

NJDEP COMMENTS ON
RIR and RAW and CEA INFORMATION for SITE 1122
FORT MONMOUTH, NJ

RIR & RAW

1. Contaminants of Concern. The report failed to identify benzene, n-Nitrosodiphenylamine and total TICs as ground water contaminants of concern (COCs). Based upon the analytical results, those contaminants exceeded the GWQC and therefore must be COCs. The report must be revised accordingly.
2. Delineation. The horizontal and vertical extent of ground water contamination hasn't been delineated as required by N.J.A.C. 7:26E-4.1(b). All ground water contaminants must be delineated to the GWQC with permanent wells. This applies to the following areas of ground water contamination:
 - a) The benzene and total TICs in the vicinity of geoprobes GW9, GW17, GW18 and GW19 (total TIC exceedances must be addressed in accordance with N.J.A.C. 7:26E-2.1(e)).
 - b) The n-Nitrosodiphenylamine in the vicinity geoprobes GW7, GW8 and GW9.
3. GW21. Geoprobe boring GW21 was completed in the vicinity of the 1,500 gallon Diesel UST. A soil sample at GW21 had elevated levels of benzene, ethylbenzene and xylene (180 ppm, 5,000 ppm, and 16,000 ppm, respectively).
 - a) The levels of these contaminants in soil are indicative of a source of fuel oil contamination. Delineation of the soil contamination at this area must be performed.
 - b) A ground water monitoring well must be installed and sampled at the location of GW21, pursuant to N.J.A.C. 7:26E-4.4(e). Samples shall be analyzed for VOC+10 and BN+15.

NJDEP COMMENTS ON
RIR and RAW and CEA INFORMATION for SITE 1122
FORT MONMOUTH, NJ (continued)

4. **Free Product.** Section 7.0 (Conclusions & Recommendations) states that free product was identified in ground water during the Geoprobe investigation and was removed from the Geoprobe borings on an as-needed basis. It further states that the results show that the free product is contained to an approximately 15 foot long area and is not migrating towards Mill Creek. This information was not presented in detail in Section 5.0 (Site Chemical Characterization), and there are no figures in the report to show the extent of free product. Delineation of the free product must be completed, and the following must be added to the report:
- A full discussion of the product discovery in Section 5.2 of the report
 - A figure identifying the geoprobes that contained the product
 - A figure showing the areal extent of the product
 - A table indicating the thickness of the product
5. **Surface Water.** Section 7.0 states that tetrachloroethylene (PCE) found in surface water is from a source upgradient of Fort Monmouth. The data indicate that PCE concentrations in Mill Creek decrease from upstream to downstream.
- a) However, if future ground water sampling shows that PCE or other contaminants from the Building 1122 area may be reaching Mill Creek, NJDEP will require additional surface water sampling to verify and characterize any discharge. Passive diffusion bags (PDB) could be employed in such sampling.
- b) For future reference, the location of sample location #23 on Figure 5-3 is too close to the M-2 landfill to be considered an upstream sample that is clearly unaffected by the landfill. A location further upstream should be used in any future sampling.
6. **Remedial Action.** The proposal for a MNA remedy for PCE is not acceptable at this time. After delineation of other ground water contaminants and free product is complete, remedial action may be required.
7. **General.** All sampling procedures and equipment decontamination shall be conducted consistent with methods described in the most recent version of the NJDEP Field Sampling Procedures Manual, vs. the Fort Monmouth Standard Sampling Operating Procedure, per the requirements of N.J.A.C. 7:26E-4.4(d).

NJDEP COMMENTS ON
RIR and RAW and CEA INFORMATION for SITE 1122
FORT MONMOUTH, NJ (continued)

8. Ground Water Contour Maps (Figures 4-4a, through 4-4n): 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.

CEA Information Report

1. General. Since the NJDEP has determined that a RI of ground water hasn't been completed, and that remedial action may be required, the CEA proposal can't be evaluated now. A revised CEA proposal should be submitted after additional RI/RAS work is completed and submitted to NJDEP.
2. Ground Water Use. The current and projected use of ground water in the proposed CEA must be addressed in the revised CEA proposal, pursuant to N.J.A.C. 7:26E-8.3(b)4.
3. UST Removal. Discrepancies must be clarified regarding the description of the 1,500 gallon UST removal. The RIR/RAWP document indicates that there was no evidence of a release or contaminated soils. The CEA document however, states that soil sample results indicated a release had occurred and that petroleum contaminated soils were excavated.
4. MTBE. The CEA proposal lists MTBE as a contaminant of concern. The RIR/RAWP does not consider this compound to be contaminant of concern. This discrepancy must be resolved.
5. Free product. The CEA proposal (dated July 2004) states that future remedial options regarding free product are being assessed, yet Section 8.0 (Remedial Action Workplan) of the RIR/RAWP (dated October 2005) makes no mention of remedial action for free product. This discrepancy must be resolved.

CERTIFICATION

For: Remedial Action Work Plan, Site 1122, Fort Monmouth, New Jersey

“I certify, under penalty of law, that the information provided in this document is true, accurate, and complete to the best of my knowledge. I am aware that there are significant civil penalties for knowingly submitting false, inaccurate or incomplete information and that I am committing a crime of the fourth degree if I make a written false statement which I do not believe to be true. I am also aware that if I knowingly direct or authorize the violation of any statute, I am personally liable for the penalties.”

Joseph Fallon
Environmental Team Leader

Name, Title



Signature

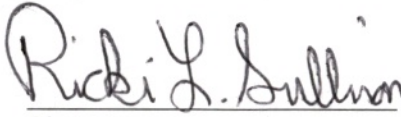


Date

“I certify, under penalty of law, that I have personally examined and am familiar with the information submitted herein and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete to the best of my knowledge. I am aware that there are significant civil penalties for knowingly submitting false, inaccurate or incomplete information and that I am committing a crime of the fourth degree if I make a written false statement which I do not believe to be true. I am also aware that if I knowingly direct or authorize the violation of any statute, I am personally liable for the penalties.”

Ricki L. Sullivan, COL, FA
Garrison Commander

Name, Title



Signature



Date

This Remedial Action Work Plan has been reviewed and approved.

Larry Quinn, Site Manager
NJDEP, Bureau of Case Management

Name, Title

Signature

Date