



New Jersey Department of Environmental Protection

Site Remediation Program

Report Certifications for RCRA GPRA 2020, CERCLA, and Federal Facility Sites

These certifications are to be used for reports submitted for RCRA GPRA 2020, CERCLA, and Federal Facility Sites. The Department has developed guidance for report certifications for RCRA GPRA 2020, CERCLA, and Federal Facility Sites under traditional oversight. The "Person Responsible for Conducting the Remediation Information and Certification" is required to be submitted with each report. For those sites that are required or opt to use a Licensed Site Remediation Professional (LSRP) the report must also be certified by the LSRP using the "Licensed Site Remediation Professional Information and Statement". For additional guidance regarding the requirement for LSRPs at RCRA GPRA 2020, CERCLA and Federal Facility Sites see http://www.nj.gov/dep/srp/srra/training/matrix/quick_ref/rcra_cercla_fed_facility_sites.pdf.

Documents:

- "Response to NJDEP's August 25, 2015 Comments on the April 2015 *Underground Storage Tanks Within ECP Parcel 79, Fort Monmouth, New Jersey*," and
- "Parcel 79 Work Plan Addendum for Former Storage Tank Sites" (February 2016)

PERSON RESPONSIBLE FOR CONDUCTING THE REMEDIATION INFORMATION AND CERTIFICATION

Full Legal Name of the Person Responsible for Conducting the Remediation: William R. Colvin

Representative First Name: William Representative Last Name: Colvin

Title: Fort Monmouth BRAC Environmental Coordinator (BEC)

Phone Number: (732) 380-7064 Ext: Fax:

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City/Town: Oceanport State: NJ Zip Code: 07757

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This certification shall be signed by the person responsible for conducting the remediation who is submitting this notification in accordance with Administrative Requirements for the Remediation of Contaminated Sites rule at N.J.A.C. 7:26C-1.5(a).

I certify under penalty of law that I have personally examined and am familiar with the information submitted herein, including all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, to the best of my knowledge, I believe that the submitted information is true, accurate and complete. 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.

Signature: [Handwritten Signature] Date: 2/10/2016

Name/Title: William R. Colvin, PMP, CHMM, PG BRAC Environmental Coordinator



DEPARTMENT OF THE ARMY

OFFICE OF ASSISTANT CHIEF OF STAFF FOR INSTALLATION MANAGEMENT
U.S. ARMY FORT MONMOUTH
P.O. 148
OCEANPORT, NEW JERSEY 07757

February 10, 2016

Ms. Linda Range
New Jersey Department of Environmental Protection
Bureau of Case Management
401 East State Street
PO Box 420/Mail Code 401-05F
Trenton, NJ 08625-0028

**Re: Response to NJDEP's August 25, 2015 Comments on the April 2015 *Underground Storage Tanks Within ECP Parcel 79, Fort Monmouth, New Jersey*
PI G000000032**

Dear Ms. Range:

Fort Monmouth and Parsons have reviewed the New Jersey Department of Environmental Protection (NJDEP) comments on the subject submittal for ECP Parcel 79, as documented in your letter dated August 25, 2015. We appreciate this opportunity to work with you on Parcel 79. Responses to your comments are provided below, for your review and concurrence or further comments.

A. Attachment E – Areas 74 and 75, Aboveground Storage Tanks and Associated Piping

A1. COMMENT: *Area 75 – Aboveground Storage Tanks: Two 210,000 gallon aboveground storage tanks, utilized from the 1940s through the 1980s, were removed in May of 1995. Based upon a review of the analytical results and chain of custody (COC) as well as a conversation with Joe Fallon this date, who collected the samples, it appears 13 samples were collected in the proximity of AST A - all analytical results were below 1000 ppm, and 15 samples in the proximity of AST B. Per Mr. Fallon, the samples would have been collected both at/along the perimeter and within the footprint/center of the former ASTs, mainly at 0-6", but also at deeper intervals (as indicated on the COCs). Although it appears sampling frequency and location may have been adequate, it is unclear the analytical parameter requirements, either those in effect at the time of sampling or currently in effect, were met as regarding contingency analysis for AST B. Of the 15 samples apparently collected for AST B, 5 exceeded the trigger for additional analyses on 25% of those exceeding 1000 ppm (VOs+ 10 at the time of sampling, 2-methylnaphthalene and naphthalene per current guidance). It is also unclear where the ground water sampling points referenced for Area 74 were located relative to the former ASTs of Area 75?*

A1. RESPONSE: Additional soil and groundwater sampling is proposed at Area 75 as described in the attached *Parcel 79 Work Plan Addendum*. Soil sample results from 1995 were reported in the April 2015 *Underground Storage Tanks Within ECP Parcel 79* submittal; however, there is some uncertainty regarding the sample locations because a sample map was not located. For example, the highest Total Petroleum Hydrocarbons (TPH) concentrations in soil were encountered in samples labeled as "AST-B," but it is unclear to which of the two ASTs these sample designations referred. Further, there was uncertainty regarding the locations of groundwater samples collected for adjoining

Area 74. Therefore, soil and groundwater from both former AST locations (AST-1 and AST-2 as described in the attached **Parcel 79 Work Plan Addendum**) will be re-sampled to characterize the current concentration of TPH constituents in this area and, if necessary, the need for any contingency analyses in soil. Soil samples from 4 boring locations within the vicinity of the former ASTs, and groundwater samples from two of these four locations, will be collected as described in the attached **Parcel 79 Work Plan Addendum**.

A2: COMMENT: *Area 74 -Associated Piping: As per Enclosure 4 of Attachment E, the underground piping was previously NFAed.*

A2: RESPONSE: Agreed.

B. Underground Storage Tanks

B1. COMMENT: *In addition to those USTs previously granted a designation of NFA, it is agreed no further action is necessary for the following #2 fuel USTs:*

UST 29-1 – 1000 gallon steel

UST 142A – 1000 gallon steel; C93-3714

UST 401-26 – 1000 gallon steel

UST 416-32 – 1000 gallon steel

UST 430B-45 – 550 gallon tank; C93-3987*

**note – page 1, Section 1.1 and scrap receipt each indicate UST was steel; Att B states fiberglass*

UST 443-49 – 1080 gallon steel

UST 474 – 1000 gallon steel

B1. RESPONSE: Agreed. File photographs of UST 430B-45 confirm that it was a steel tank.

B2. COMMENT: *Although the 2008 Site Investigation previously performed did include ground water sampling, a review of the sampling points did not indicate they were placed within distances sufficient to allow for adequate evaluation of the USTs referenced below. Based upon soil contamination extending to within 2' of, and in many cases, into the ground water table (GWT), a ground water investigation is necessary at the following UST locations (the elimination of the sheen via excavation, as referenced for USTs 441, 444 is insufficient):*

UST 142B (Attachment H)

UST 437 (Attachment Q)

UST 440 (Attachment R)

UST 441 (Attachment S)

UST 444 (Attachment U)

UST 448 (Attachment W); please specify if well P79-E2 is sufficiently proximate to comply with regulations/guidance

UST 449 (Attachment X)

UST 450 (Attachment Y)

UST 451 (Attachment Z)

B2. RESPONSE: Additional groundwater sampling is proposed to assess the potential for impacts to groundwater from each of the UST sites listed above, as described in the attached **Parcel**

79 Work Plan Addendum. The 2008 SI sample P79-E2 was slightly displaced from the former UST 448 location and so additional sampling near this UST location will be performed. Also, UST 445 has been added to this list (see Response B3 below). A total of 10 groundwater samples will be collected from temporary well locations downgradient of these former USTs.

B3. COMMENT: *Though it is understood no evidence was found of a tank remaining in the below referenced locations during geophysical or trenching activities, a tank was noted as present in historic Army material, e.g. 1956 Fuel Storage Map, while Attachment 1 indicates heating oil USTs may remain between Tilly Avenue and Leonard Avenue. No soil sampling was apparently performed in any of these locations. Unless all tanks, former or current, have been evaluated in accordance with the applicable Departmental regulations and guidance documents, the NJDEP cannot comment as to the absence or presence of a petroleum discharge. The request on page 7 of 7 for designation of an NFA for the following USTs cannot be granted unless the necessary sampling is performed at each:*

UST/Bldg. No. 168 (Attachment I)

UST/Bldg. No. 169 (Attachment I)

UST/Bldg. No. 407

UST/Bldg. No. 415

UST/Bldg. No. 424

UST/Bldg. No. 425

UST/Bldg. No. 435 (Attachment P)

UST/Bldg. No. 438

UST/Bldg. No. 442

UST/Bldg. No. 455 (Attachment V)

UST/Bldg. No. 456 (Attachment AA consisted of only analytical data, from a single sample – 6-12”; information provided is insufficient for evaluation/comment)

USTs/Bldg. No.s 457 through 467

UST/Bldg. No.s 469 through 473

UST/Bldg. No. 476

UST/Bldg. No. 488

UST/Bldg. No. 489

B3. RESPONSE: As discussed in the April 2015 *Underground Storage Tanks Within ECP Parcel 79* submittal, the Army has conducted adequate due diligence to assess the presence of USTs within Parcel 79, including the use of geophysical survey techniques, historical maps and metal detectors to locate USTs. Since there were no indications of USTs at these sites, the Army is not proposing additional assessment work at the above locations.

Note that Attachment V in the April 2015 *Underground Storage Tanks Within ECP Parcel 79* submittal provides analytical data for UST 445, not UST 455 as noted above. There was no tank removed or analytical data collected at the Building 455 location; however, the Army removed an UST and collected analytical data in support of closure at UST 445. Therefore, we request that NJDEP re-evaluate UST/Bldg. No. 445 as described in Attachment V of the April 2015 *Underground Storage Tanks Within ECP Parcel 79* submittal. In anticipation of NJDEP’s request to address a potential data need, one additional groundwater sample is proposed from a location

downgradient of UST 445 to assess the potential for impact to groundwater, as described in the attached *Parcel 79 Work Plan Addendum*.

Although Building 433 was not specifically mentioned in the above comment, the Army has no record or geophysical evidence of an UST at former Building 433, and therefore the Army is not proposing additional assessment work at the Building 433 location.

B4. COMMENT: *While not indicated as present on the 1956 Fuel Storage map, nor found during geophysical survey activities, the 2014 ECP UHOT Report indicates a potential for the presence of an UST at several additional locations. Although no tank was found, insufficient information (sampling) has been submitted to allow for comment as to the presence or absence of a discharge for the following:*

UST/Bldg. No. 170 (Attachment I)

UST/Bldg. No. 171 (Attachment I)

UST/Bldg. No. 408

UST/Bldg. No. 436

UST/Bldg. No. 468

B4. RESPONSE: Comment acknowledged. As discussed in the April 2015 *Underground Storage Tanks Within ECP Parcel 79* submittal, the Army has conducted adequate due diligence to assess the presence of USTs within Parcel 79, including the use of geophysical survey techniques, historical maps and metal detectors to locate USTs. Since there were no indications of USTs at these sites, the Army is not proposing additional assessment work at the above locations. If the Army has creditable evidence of a potential release, then we will evaluate these locations to achieve regulatory acceptance and site/parcel closure. However, in absence of any new evidence, we believe that the Army has done an adequate level of due diligence.

C. Attachments J, K & L – USTs at Former Building 202

C1. COMMENT: *Four USTs were noted as present, and removed (although the ECP UHOT report indicates high potential for the continued presence of two USTs), at the former building, the specific locations of which two (202A & 202B), were not indicated. Although apparently no discharge was associated with USTs 202B or 202C (the submittal implies no soils were removed at either UST prior to the sampling which indicated non-detect TPH levels), discharges were associated with both USTs 202A and 202D.*

The affected soils at UST 202A were removed to 5.5', likely extending to within 2' of or into the ground water table, in this area, and contained almost 8,000 ppm TPHC, the level referenced in the Department's guidance (<http://www.nj.gov/dep/srp/guidance/rs/#phc>) as the residual product/free product limit. As such, it is possible former UST 202A could have contributed to the levels of ground water contamination noted at UST 202D. An NFA at this time is, therefore, not appropriate.

As indicated in the submittal, ground water was found to contain benzene at low levels, 2-methylnaphthalene, and BN TICs in a sampling event performed in June of 2011 at UST 202D. An NFA of the soils, as requested, is not appropriate at this time. Insufficient information is known relative to the ground water contamination in the area, including the current extent or levels of contamination.

C1. RESPONSE: Additional soil and groundwater sampling is proposed at former USTs 202A and 202D to assess the potential for impacts to groundwater, as described in the attached *Parcel 79 Work Plan Addendum*. This will include sampling from existing well 202MW01, which was installed in August 2011 but apparently not yet sampled. Soil samples from 3 boring locations near the former USTs 202A and 202D, and groundwater samples from one of these borings and two existing monitor wells, will be collected as described in the attached *Parcel 79 Work Plan Addendum*.

We respectfully request that NJDEP reconsider approving NFA for USTs 202B and 202C based on the soil results previously submitted (Attachments K and L of the April 2015 *Underground Storage Tanks Within ECP Parcel 79*). Following tank removals, there was no requirement for contaminated soil excavation, and all TPH soil results were nondetected for each of these tank sites.

D. Attachment CC/UST 490- aka UST 490-58

D1. COMMENT: *Although a Site Assessment Compliance Statement and Standard Reporting Form for tank removal are reported in Attachment CC as submitted to the DEP in 1991, as indicated in the submittal, there is no record of NFA approval from the NJDEP; no soil sampling had been performed at that time.*

Soil sampling collected from the 6-6.5' interval was performed in 2005, indicating levels of TPH ranged from 2981 to 8762 ppm, with VO's below criteria. Ground water samples were below the Ground Water Quality Standards (GWQS) in effect at the time, however, no report was submitted; 2-methylnaphthalene was found at 32.13 ppb. Additional sampling (actual locations of which are unclear) performed in May of 2010 (prior to phase-in of EPH), at the 3.5-4' interval – the rationale for selection of that interval is unreported – found TPH ranging from ND to 5941.76 ppm. Although the required contingency sampling was reported as exhibiting no exceedences in the submittal, the Impact to Ground Water Standard for 2-methylnaphthalene of 8 ppm was exceeded in Sample B4, with a result of 30.32 ppm. Ground water sampling conducted in May and July of 2010 found elevated levels of 2-methylnaphthalene, as well as elevated BN TICs.

No figure identifying the location of the May 2010 sampling was provided, however, it appears contamination above the 5100 ppm criterion may be present from at least the 3.5 to the 6.5' interval, and deeper. TPH/EPH cannot exceed the residual product/free product limit of 8,000 mg for No. 2 fuel; 2-methylnaphthalene above standard in the soil as well as the ground water is present. Compliance averaging of the soils is not appropriate. Additional characterization of the ground water contamination is required. The current conditions of the ground water and the extent of any contamination must be determined, at which time further decisions regarding remedial requirements may be determined.

D1. RESPONSE: Additional soil and groundwater sampling is proposed at former UST 490, as described in the attached *Parcel 79 Work Plan Addendum*. This will include sampling from existing well 490MW01, which was installed in August 2011 but not yet sampled. Soil samples from 3 boring locations near the former UST 490, and groundwater samples from these three borings and one existing monitor well, will be collected as described in the attached *Parcel 79 Work Plan Addendum*.

Linda S. Range, NJDEP
Response to Comments
Underground Storage Tanks Within ECP Parcel 79
February 10, 2016
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We look forward to your review of these responses and approval or additional comments. The technical Point of Contact (POC) for this matter is Kent Friesen at (732) 383-7201 or by email at kent.friesen@parsons.com. Should you have any questions or require additional information, please contact me by phone at (732) 380-7064 or by email at william.r.colvin18.civ@mail.mil.

Sincerely,



William R. Colvin, PMP, PG, CHMM
BRAC Environmental Coordinator

Attachment:

Parcel 79 Work Plan Addendum for Former Storage Tank Sites

cc: Delight Balducci, HQDA ACSIM (e-mail)
Joseph Pearson, Calibre (e-mail)
James Moore, USACE (e-mail)
Jim Kelly, USACE (e-mail)
Cris Grill, Parsons (e-mail)