



State of New Jersey

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BOB MARTIN
Commissioner

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Lt. Governor

July 12, 2016

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

Re: *Parcel 72 Select Unregulated Heating Oil Tanks (UHOTs) Work Plan Addendum*
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, received on July 7, 2016, prepared by the Department of the Army, to propose soil and/or ground water sampling at four former #2 fuel underground storage tank (UST) areas and one at which the #2 fuel UST remains. Comments are as follows.

UST 211

The collection of a ground water sample as proposed is acceptable.

UST 212

Although sampling was apparently performed when the reported 2000 gallon UST was removed in 2001, the analytical data was reported as unable to be located. A single soil boring is proposed, with a sample to be collected from approximately 5-5.5' below grade (as the base of a 2000 gallon tank would often lie below that depth, perhaps a foot or so deeper should be considered), and a second interval sampled from 0-6" above the water table (which is appropriate). Based upon the former tank size, however, a minimum of two soil boring locations is necessary.

Although the UST is reported as unregulated, and therefore exempt from N.J.A.C. 7:14B, as per Section 3 *Applicability*, of the July 31, 2012 *Technical Guidance for Investigation of Underground Storage Tank Systems*, the exempted USTs must still comply with certain other Department regulations (ARRCs, Tech Rules), and use of the guidance document is appropriate. Section 5.2.1.1 of this guidance document indicates one location for each 5' of tank length is to be collected.

The collection of a ground water sample as proposed is acceptable.

UST 220B

The collection of a ground water sample as proposed is acceptable.

Is UST 220B considered the same tank as that referenced in Appendix G and Figure 15 of the '07 ECP as UST-220-14?

UST 226

The collection of a ground water sample as proposed is acceptable.

UST 228B

UST 228B (is this also known as UST 228-20 in Appendix G & Figure 15?) remains in place, however, appears to be out-of-service. Have the contents been removed? If the tank remains in service, four samples are required (Section 5.1.2 of the above referenced guidance document). If it is out of service, the tank should be closed in accordance with any applicable regulations.

USTs may only be abandoned in place if there is no contamination detected above remediation standards, or when there is evidence of a discharge but removal is not feasible (Section 5.2.2 of the guidance document). Sampling must be performed *through* the bottom of the tank to ensure no contamination is present beneath the UST, at 5' intervals along the center line. As this is a 1000 gallon UST, at least two sample locations through the bottom would be necessary.

Finally, the above comments address only those five USTs included in the work plan, rather than all USTs having been noted (including those of "high potential") within the parcel. This office looks forward to receipt of the request for NFA determination for the former USTs within the parcel as referenced in the submittal.

Please contact this office with any questions.

Sincerely,

A handwritten signature in blue ink that reads "Linda S. Range". The signature is written in a cursive style with a large initial "L".

Linda S. Range

C: Joe Pearson, Calibre
James Moore, USACE
Rick Harrison, FMERA
Joe Fallon, FMERA