



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

July 12, 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 October 13, 2015 Comments on the July 30, 2015 *No Further Action Request, Site Investigation Report Addendum for the ECP Parcel 83 Underground Storage Tanks, Fort Monmouth, NJ*
PI G000000032

Dear Ms. Range:

The Fort Monmouth team has reviewed the New Jersey Department of Environmental Protection (NJDEP) comments on the subject submittal for underground storage tanks (USTs) at ECP Parcel 83, as documented in your letter dated October 13, 2015. We appreciate this opportunity to work with you on Parcel 83 USTs. Responses to your comments are provided below, for your review and concurrence or further comments.

A. General Comments

A1. COMMENT: *Page 2 of 4 of the submittal indicates certain USTs specifically mentioned in previous NJDEP comments are not included in this submittal as there are no USTs associated with the particular buildings, specifically Buildings 66, 281 or 479. In reviewing this submittal, the UST referenced as near Building 281 appears to have been addressed via remedial activities at UST 108-7; see below for comment regarding same. USTs at (former) Buildings 66 and 479 (and 478) are shown in the 1956 Fuel Storage map, Appendix O, of the '07 ECP, as well as indicated as "high potential UHOTs" in Figure 2 of the July 2014 UHOT Investigation Report. Unless all tanks, former and/or current, have been evaluated in accordance with the applicable regulations and guidance documents, the NJDEP cannot comment as to the potential absence or presence of a petroleum discharge associated with those tanks.*

A1. RESPONSE: As discussed in the Parcel 83 USTs submittal, the Army has conducted a detailed review of available information to assess the presence of USTs within Parcel 83. Since there were no additional indications of USTs at Buildings 66, 478, and 479, the Army is not proposing additional assessment work at these locations. We concur that the UST near Building 281 is UST 108-7 (aka UST 108A) for which a NFA determination was received (NJDEP letter dated October 13, 2015).

A2. COMMENT: *As indicated in the submittal, numerous underground storage tanks (USTs) have previously received a designation of No Further Action (NFA) required. Based upon a review of the referenced submittal, it is also agreed NFA is necessary for the following USTs:*

- *UST 49-76 & UST-49-77; #01-05-24-1004-1; each 5000 g gasoline (Attachment E)*
- *UST 63B aka UST 63-2; 1000 g #2 fuel (Attachment F)*
- *UST 108A aka 108-7; 1000 g #2 fuel (Attachment I)*
- *UST 116B aka UST 116-9; #97-04-10-1409-35; 1000 g #2 fuel; NFAed 10/23/00; ECP Parcel 85; additional sampling performed in May 2010 indicates NFA remains appropriate (Attachment J)*
- *UST 117C aka UST 117-72; #84-04-28-1944-21; 1000 g #2 fuel; ECP Parcel 86 (Attachment K)*
- *USTs 161 – Parcel 87 (Attachment L)*
 - *UST 161-68; 550 g waste oil*
 - *UST 161-14; 1000 g #2 fuel; #93-03-12-2158-30*
- *UST 167-18; 1000 g #2 diesel (Attachment M)*
- *USTs 273 aka 009001-65,66 & 67 (Attachment N)*
 - *UST 273-65; 6000 g diesel*
 - *UST 273-66; 10,000 gasoline*
 - *UST 273-67; 10,000 g gasoline*
 - *Note – the NFA is applicable to the USTs only, not the dispenser/s, which were reported as used with the AST fuel storage system which replaced USTs 273 until subsequent AST closure in 2011*
- *UST 483-55; #97-03-19-1359-16; previously NFAed 10/23/00; additional sampling performed in May 2010 indicates NFA remains appropriate (Attachment P)*

A2: RESPONSE: Agreed. UST 273 had newer (1991) fiberglass tanks and piping with secondary containment, and was fully compliant with the release detection requirements for tanks (N.J.A.C 7:14B-6.5) and piping (7:14B-6.6). Further, the dispenser islands were less than 10 ft from the UST excavation, so any leakage from the dispenser area would likely have been detected in closure soil samples (which were clean). The Army is not proposing additional assessment work at the dispensers.

B. UST 80 aka 80-6 aka FTMM-56 – Parcel 84 (Attachment G)

B1. COMMENT: *UST 80-6 was a #2 fuel tank which was granted an NFA by the Department on August 29, 2000. Ground water contamination at FTMM-56 unrelated to #2 fuel was monitored on a quarterly basis for many years. Submittal of analytical results from the additional round of ground water sampling as per the DEP's July 3, 2014 comment letter are pending.*

B1. RESPONSE: We anticipate a future Army submittal concerning IRP site FTMM-56 (Building 80 Petroleum Release) that will summarize the soil and groundwater results.

C. USTs 108-60 through 64 aka FTMM-57 – Parcel 90

C1. COMMENT: *Attachment H references five USTs which were removed in April of 1993, and lists just over a page with descriptive bullets of documents reported to include remedial activities relative to these USTs, concluding that reported results support site characterization work is complete. The submittal, however, includes no results; comments regarding adequacy of characterization and recommendations as to additional action are therefore not possible at this time.*

C1. RESPONSE: We anticipate a future Army submittal concerning IRP site FTMM-57 (Building 108 UST Gasoline Release) that will summarize the soil and groundwater analytical results.

D. UST 482-54 – Parcel 93 (located within Parcel 83)


D1. COMMENT: *As regarding UST 482-54 (#94-08-11-1345-43), which was NFAed in January of 2003, Attachment O appears to indicate TPH contaminated soils remain at levels of 14,100 ppm and 29,400 ppm. As indicated in the email of October 9, 2015, clarification is requested, as a designation of NFA is not appropriate for contamination at this level.*

D1. RESPONSE: Historical information and recent (April 2016) field observations of elevated photoionization detector (PID) readings in a boring near UST 482-54 indicate that additional characterization of the former UST 482 area is warranted. Field sampling at the UST 482 area will be performed at the same time that additional sampling at Parcel 83 is performed (which will be described under separate cover).

We request your review of these responses regarding USTs at ECP Parcel 83. Additional submittals for FTMM-56 (Building 80), FTMM-57 (Building 108), and UST 482 are forthcoming, as indicated above. Other specific issues concerning known or suspected non-UST contamination of soil or groundwater at Parcel 83 will also be addressed under separate cover as described in the November 2015 (Revision 1) *Environmental Condition of Property Phase II Site Investigation Work Plan Addendum* (the ECP Work Plan Addendum).

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 e-mail at william.r.colvin18.civ@mail.mil.

Sincerely,


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

cc: Linda Range, NJDEP (e-mail and 3 hard copies)
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)



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 October 13, 2015 Comments on the July 30, 2015 *No Further Action Request, Site Investigation Report Addendum for the ECP Parcel 83 Underground Storage Tanks, Fort Monmouth, NJ*

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: _____

Mailing Address: P.O. Box 148

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

Email Address: william.r.colvin18.civ@mail.mil

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:  Date: 12 July 2016

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