

Submitted by Email: Janis.Hottinger@DEP.state.nj.us

30 August 2010

Janis Hottinger
Senior Environmental Specialist
New Jersey Department of Environmental Protection
Bureau of Landfill & Hazardous Waste Permitting
P.O. Box 414
Trenton, NJ 08625-0414

Subject: NJDEP Minor Disruption Approval Application – Response to Review Comments
United States Army Fort Monmouth
Eatontown & Oceanport Boroughs, Monmouth County, New Jersey
Facility ID No. 132449; Permit No. LCB100002
Princeton Hydro, LLC Project No: 0959.003

Dear Ms. Hottinger:

On behalf of the *US Army, Fort Monmouth* (applicant), Princeton Hydro, L.L.C. (agent) provides this correspondence and its attachments as response to Bureau review comments received by letter dated 26 August 2010 and via telephone discussion 5 August 2010 regarding the above-referenced minor disruption application. The application encompasses on-going and future landfill boundary delineation activities as well as foreseeable contaminant monitoring and remediation programs at Fort Monmouth.

The following responses are provided to the Department's comments:

1. Purpose and Extent of Operations (reference to Methane Gas Survey) – The Department stated that it is not necessary for the application to include an SOP for methane gas survey, rather the application should state that the Department's sanitary landfill sampling requirements will be implemented. By letter dated 26 August 2010, the Department provided the citation for methane gas survey and described sampling guidance that describes barometric pressure sensitivity.

Response: *We acknowledge the NJDEP's comment and the attached revised Landfill Disruption application narrative incorporates the Department's request.*

2. Cover – The Department requested that Fort Monmouth separate existing clean cover material to the extent practical and re-use such material during backfill, but also stated that clean cover material is required to be on-hand in order to satisfy the Department's minimum one-foot final cover condition (refer to Department's 26 August 2010 letter).

Response: *We acknowledge the NJDEP's comment and the attached revised Landfill Disruption application narrative incorporates the Department's request.*

Princeton Hydro, LLC

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3. **Odor/Gas Control** - in addition to sensory odor observations, an FID or PID must be used for monitoring.

Response: *A MultiRAE gas meter will be utilized which includes a PID detector; the attached revised Landfill Disruption application narrative incorporates the Department's request.*

4. **Discovery of Hazardous Waste** - include the Department's Division of Solid and Hazardous Waste contact telephone number (609-984-6043) and the Department's notification hotline number (877-927-6337).

Response: *The Department's requested information was incorporated into the attached revised Landfill Disruption application. Furthermore, the Department's contact and hotline notification telephone numbers will be included in revised site-specific Health and Safety Plans developed for the project.*

5. **COMPLIANCE STATEMENT** - correct the first instance citation for "NJAC 7:26-2A.8(j)" by addition of ".8"; refer to the current name of the division as "Bureau of Landfill and Hazardous Waste Permitting" rather than "Bureau of Landfill and Recycling Management" (former name).

Response: *The attached revised Landfill Disruption application narrative incorporates the Department's request.*

6. **V. Schedule of Activities.** - a "formal letter" may be submitted by email rather an "email" notice.

Response: *The attached revised Landfill Disruption application narrative incorporates the Department's request.*

7. **NJDEP Solid Waste Facility Application Form** – Fort Monmouth must provide Block and Lot numbers for the areas subject to the application.

Response: *The attached revised Solid Waste Form incorporates the Department's request – added "page 11" provides the required Block and Lot numbers. In addition, two maps that identify each landfill on the Main Post (MP) and Charles Wood Area (CWA) portions of Fort Monmouth are included.*

8. **Health and Safety Plans** - for all HASP, to organizational context, add the Department emergency notification hotline number (877-927-6337); confirm that identified hospital(s) can accept trauma patients; in addition to mapped hospital route, add narrative description of hospital driving directions.

Response: *The Department's emergency notification hotline number (877-927-6337) will be added to the organizational context of each HASP. Please refer to page IVA-24 of Fort Monmouth's Spill Prevention, Control and Countermeasures Plan/Installation Spill Contingency Plan/RCRA Contingency Plan for information concerning the use of local hospitals. The SPCCP/ISCP/RCP is attached for incorporation into the permit application. Driving directions to all referenced hospitals will be added to each HASP.*

Additionally, as discussed by telephone (30 August 2010), Fort Monmouth is not required to re-submit site-specific HASP documents for Department review. Rather, the revised HASP documents will be used during implementation of various activities encompassed by the Minor Landfill Disruption approval.

If there are any questions pertaining to this application, please do not hesitate to contact me at our Ringoes, NJ office at 908.237.5660 or by email at jshallenberger@princetonhydro.com.

Sincerely,
Princeton Hydro, LLC

A handwritten signature in blue ink, appearing to read "James P. Shallenberger", with a long horizontal flourish extending to the right.

James P. Shallenberger, P.G.
Senior Project Manager

cc:

Joseph Fallon – Fort Monmouth, Directorate of Public Works
File 959.003

Enclosures: Revised Landfill Minor Disruption Approval Application (narrative)
Revised Solid Waste Form
Forth Monmouth Spill Prevention, Control, Countermeasures Plan