



## State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

CHRIS CHRISTIE  
Governor

KIM GUADAGNO  
Lt. Governor

SOLID & HAZARDOUS WASTE MANAGEMENT PROGRAM  
BUREAU OF LANDFILL AND HAZARDOUS WASTE PERMITTING  
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TRENTON, NEW JERSEY 08625-0414  
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[HTTP://WWW.STATE.NJ.US/DEP/DSHW](http://www.state.nj.us/dep/dshw)

BOB MARTIN  
Commissioner

AUG 26 2010

Mr. Joseph Fallon, Chief  
Environmental Division  
U.S. Army Garrison – Fort Monmouth  
Directorate of Public Works  
167 Riverside Avenue  
Fort Monmouth, NJ 07703

Re: Notice of Deficiency  
Disruption Application  
US DOD-ARMY-MONMOUTH  
Oceanport Borough, Monmouth County  
Facility ID No.: 132449  
Permit No.: LCB100002

Dear Mr. Fallon:

The Bureau of Solid & Hazardous Waste Permitting (Bureau) is in receipt of a Sanitary Landfill Disruption Application, dated May 17, 2010 for the above referenced facility.

The Bureau has completed a review of the application to determine if the submittal is technically complete. Upon review, the Bureau has determined the application is INCOMPLETE.

In order for this office to determine the application complete, the following deficiencies must be addressed:

1. Introduction, page 1, fourth paragraph:  
The applicant has requested the disruption approval remain valid for a period of ten years. The usual expiration period for a minor disruption is six months from the approval date. The Bureau is willing to grant the applicant five years to complete its minor disruption activities. At the end of five years, if the applicant still requires time to complete remedial activities, it shall submit a written request to the Bureau to extend the disruption approval expiration date.
2. Purpose and Intent of Operations, page 4:  
The last two sentences of the first paragraph state that methane gas surveys for the landfills will not be performed until a Standard Operating Procedure (SOP) is submitted to the Bureau. The Bureau does not need an SOP for this task to be completed. Please

refer to citation 7:26-2A.8(h)9 for guidance in completing the survey. The initial survey should be completed immediately to evaluate whether gas is migrating laterally from the landfills. Thereafter, surveys shall be performed quarterly.

The Bureau has also determined that landfill gas migration monitoring should occur in the afternoon of days when atmospheric barometric pressure is falling and not rising. Significant evidence exists that rising barometric pressure, and daily higher pressure in the morning, readily suppress landfill gas in the soil resulting in reduced or non-detect test results whereas gas would actually be present and migrating laterally from the landfill during periods when barometric pressure is falling. Barometric pressure is typically lower in the afternoon compared to morning pressure. Please report the barometric pressure at 2-hour intervals beginning 12 hours prior to the start of monitoring through the time monitoring is complete. If it is determined that the pressure is not falling, then the sampling event shall be rescheduled for another day. A report where the barometric pressure is rising and not falling shall be rejected by the Bureau.

The Bureau requires monitoring events to occur when they are scheduled, including during frozen and related weather conditions that could promote lateral gas migration.

3. Cover, page 4:

The Bureau understands that test pits shall be performed to define the lateral extent of the landfill boundaries. The Bureau understands that waste material from each test pit shall be backfilled into the excavation. One foot of clean soil shall be placed on the excavation. Please include in this section and any other where applicable.

4. Odor and Gas Control, page 4:

This section does not indicate that landfill gas monitoring will be conducted during bore hole and test pit operations. Monitoring landfill gases during field operations is necessary for health and safety. Please include landfill gas monitoring in this section and any other where applicable.

5. Discovery of Hazardous Waste, page 5:

Please include notification to the Department's Environmental Hotline at 1-877-WARNDEP if hazardous waste is encountered.

6. Compliance Statement, page 5:

Please include the correct Bureau name and citation.

7. V. Schedule of Activities, page 8:

This section indicates the Bureau will receive electronic mail (e-mail) notifications of upcoming disruption activities. The e-mail shall include the disruption activity and its corresponding schedule. The Bureau requests that a signed letter be sent in addition to the e-mail notification.

8. Solid Waste Facility Application Form, Attachment A:

Please provide the Blocks and Lots on which each landfill is located.

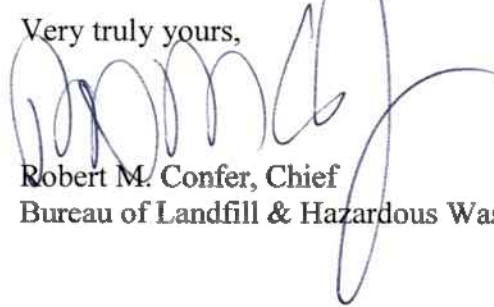
9. Health and Safety Plans, Attachment C:

- a. Emergency Contact/Notification System: Please include a notification to the Department's Environmental Hotline at 1-877-WARNDEP.
- b. Please include written driving directions to each hospital and its corresponding emergency telephone number.

A response to this notice of deficiency that adequately addresses each noted item is required to be submitted to the Bureau within thirty (30) days from the date of this letter. Failure to submit a complete and timely response may result in the Bureau rejecting the application as technically incomplete.

If you have any questions concerning this matter, please contact Janis Hottinger of my staff by telephone at 609-984-6043, or by email at [janis.hottinger@dep.state.nj.us](mailto:janis.hottinger@dep.state.nj.us).

Very truly yours,



Robert M. Confer, Chief  
Bureau of Landfill & Hazardous Waste Permitting

LD10-7837

- c: Rai Belonzi, Compliance and Enforcement Bureau Chief  
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