

United States Army Fort Monmouth, New Jersey



M-2 Landfill (FTMM-02) Remedial Investigation of Landfill Cover Requirements

U.S. Army Garrison Fort Monmouth, Main Post
Fort Monmouth, New Jersey

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**U.S. Army Garrison Fort Monmouth, Main Post
Fort Monmouth, New Jersey**

TABLE OF CONTENTS

1.0	Purpose	1
2.0	Site Location and Description	2
3.0	Aerial Photograph Review – Fort Monmouth (1940-1974)	3
4.0	Project History Chronology	5
5.0	Remedial Investigation (RI) Site Activities – November 1998 to June 1999	7
6.0	Laboratory Analytical Results	8
7.0	Depth of Cover Material	12
8.0	Proposed Final Remedial Action	13
9.0	References	14

**M-2 Landfill (FTMM-02)
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**TABLE OF CONTENTS
(Continued)**

FIGURES

Figure 1 - Site Location Map (USGS Topographic Map)

Figure 2 - Figure 2 - All Exceedances Contaminant Map, M-2 Landfill

Figure 3 – Metals Contaminant Map, M-2 Landfill

Figure 4 - PCB (Polychlorinated Biphenyl) Contaminant Map, M-2 Landfill

Figure 5 - SVOC (Semivolatile Organic Compound) Contaminant, Map M-2 Landfill

Figure 6 - Trenching Location Map, M-2 Landfill

TABLES

Table 1 – Soil Sample Collection Summary

Table 2 – Soil Sampling Results Summary - M-2 Landfill

Table 3 – Borings in which detections exceeded NJDEP SRS, M-2 Landfill

Table 4 – Nonresidential Exceedance Summary, M-2 Landfill

Table 5 - Cover Material Summary, M-2 Landfill

EXHIBITS

- Exhibit I - Remedial Investigation Report for Near Surface Soils – M-2 Landfill, Fort Monmouth, New Jersey, prepared by Versar, Inc., dated February 23, 2004
- Exhibit II - Aerial Photographs
- Exhibit III - New Jersey Department of Environmental Protection Correspondence and Fort Monmouth Correspondence
- Exhibit IV - Landfill Disruption Documentation
- Exhibit V - Landfill Delineation Trench Logs

M-2 LANDFILL (FTMM-02)
REMEDIAL INVESTIGATION OF LANDFILL COVER REQUIREMENTS

U.S. ARMY GARRISON FORT MONMOUTH, MAIN POST
FORT MONMOUTH, NEW JERSEY

1.0 PURPOSE

This study was prepared in order to propose meaningful remedial action needed to achieve regulatory closure of the historic M-2 Landfill. Said study incorporates data concerning the redefined landfill area, depth of landfill cover, and the type and degree of contamination present as it relates to current applicable New Jersey Department of Environmental Protection (NJDEP) Soil Remediation Standards (SRS). The study concludes with a proposal for final remedial action.

The majority of information summarized in this report was obtained from the *Remedial Investigation Report (RIR) for Near Surface Soils – M-2 Landfill*, Fort Monmouth, New Jersey, prepared by Versar, Inc. (Versar) dated February 23, 2004. The RIR summarizes a Remedial Investigation (RI) performed from 1998 to 1999 at the M-2 Landfill. The Versar RIR is provided in Exhibit I of this report. Additional information in this report was provided by representatives of Fort Monmouth (Fort).

Data from the 1998-1999 RI presented in the Versar RIR were compared to the NJDEP's Residential Direct Contact Soil Cleanup Criteria (RDCSCC), in effect at that time. The same data are summarized in this report as compared to the Nonresidential Direct Contact Soil Remediation Standards (NRDCSRS) due to the 2008 adoption of the SRS and the acknowledgement of the Fort that the landfill will be deed restricted for nonresidential uses.

2.0 SITE LOCATION AND DESCRIPTION

The former M-2 Landfill is located on the south side of Mill Creek on the Main Post of Fort Monmouth. The Main Post encompasses approximately 630 acres and is generally bounded by State Highway 35, Parkers Creek, Lafetra Creek, the New Jersey Transit Railroad, and a residential area to the south. The M-2 Landfill is bounded by Mill Creek to the west-northwest, off-base areas of the Borough of Eatontown to the southwest/south/southeast, and Building No. 1122 to the northeast. The M-2 Landfill reportedly contained domestic and industrial wastes. The approximate size of the M-2 Landfill is 280,400 feet (6.5 acres). Based upon historical research, the period of operation of the M-2 Landfill was approximately 1964 to 1968 (possibly into 1969).

The M-2 Landfill is located on the south side and adjacent to Mill Creek, which flows eastward into Parkers Creek. The USGS topographic map (Figure 1) shows that the land surface of the site is relatively flat at an elevation of less than 20 feet above mean sea level (msl). Surface water runoff from the M-2 Landfill is likely to flow northward into Mill Creek. A stream bank stabilization program was completed at M-2 Landfill during 2010, Figures 2, 3, 4 and 5 show the areas of work completed.

The M-2 Landfill was reportedly used for disposal of demolition debris, scrap metal, asbestos-containing materials, vegetative waste, unwashed containers which previously held hazardous materials or wastes, photographic chemicals, sewage sludge, incinerator ash, oil filters, batteries, fluorescent tubes, and electronic components. The exact date that the M-2 Landfill was last used is unknown; however, it ceased operations sometime between 1968 and 1969.

The majority of the M-2 Landfill boundaries were determined through the 1998/1999 RI, a prior review of aerial photographs of the Main Post from 1940 to 1974, and a study conducted in 2008 which included borings and trenches. (Refer to Section 7.0 of this report.) The 2008 investigation was undertaken in order to precisely delineate the perimeter of the M-2 Landfill. That effort involved performing trenches and borings at or near the perimeter of the known landfill. The excavation was stepped out from the landfill perimeter until clean soil was found. Based upon the presence of debris in some of the southernmost borings/trenches, a portion of the southern boundary of the landfill has not been fully defined to date. Additional borings and trenches south of this area were not performed as the adjacent land is private property.

3.0 AERIAL PHOTOGRAPH REVIEW – FORT MONMOUTH (1940-1974)

In order to further define the limits of the Fort landfills and obtain a better understanding of the landfill dates of operation, a review of aerial photographs was performed by Fort representatives. Photographs dated 1940, 1947, 1957, 1963, 1969 and 1974 were reviewed and are summarized below. Said aerial photographs are provided in Exhibit II.

Location Map – Long Branch, New Jersey Quadrangle

A Location Map depicting the boundary of the Main Post at Fort Monmouth shows that the Main Post is divided by Oceanport Avenue, which runs through the eastern side of the Post. The adjacent municipalities include the Borough of Shrewsbury to the north, the Borough of Eatontown to the south, the City of Long Branch to the southeast, the Borough of Oceanport to the east, and the Borough of Tinton Falls to the West. Both Parkers and Oceanport Creeks surround the northeastern boundary of the Main Post. No aerial photographs were available prior to 1940.

May 10, 1940 Aerial Photograph

The land uses for the Main Post in 1940 consist of numerous buildings, baseball fields, a golf course, a debris/rubble fill area, and an extraction area. All of the buildings are concentrated on the eastern side of the Post toward Oceanport Avenue. Two railroads are present. The first railroad is adjacent to the Oceanport Avenue section of the Main Post. The second railroad enters the Post boundary through the southeast from Oceanport Avenue and ends to the south of the Building 114 Field House. Discernible buildings include the Gosselin Avenue and 200 Area residential housing quarters, Administrative Building 286, and the soldiers' barracks at Barker Circle. The adjacent area to the Post boundary shows a mix of open space and residential neighborhoods.

September 19, 1947 Aerial Photograph

The land use for the Main Post in 1947 reveals the construction of numerous new buildings. Development of the area now spans west from the Oceanport Avenue section ending at the golf course area off of Sherrill Avenue. Both original baseball fields are no longer visible; however, there is a new field in the open space in front of Building 286. A fill area near Sherrill Avenue, which appears to be the M-5 Landfill, and an additional fill area/open storage is observed neighboring the railroad tracks adjacent to the Oceanport Avenue section. A supplementary open storage area is pictured off of Riverside Avenue where Buildings 173 and 174 exist today. A fill area is pictured stretching from the southeastern tip of the Post boundary, across the railroad, and ends in the 900 Area.

May 2, 1957 Aerial Photograph

The land uses for the Main Post in 1957 reveal additional buildings constructed on the eastern side of property near the Main Gate plus an oval running track toward the center of the southern portion of the Post. An incinerator is depicted in the southeastern corner of the Post boundary off of Main Street in the Borough of Oceanport. The M-3, M-4, M-5, and M-8 Landfills are clearly visible on the northeastern portion of the Post.

In addition, the M-12 and M-14 Landfills are clearly visible toward the center of the Post. A small probable magazine area is noted and located slightly to the north of the current M-2 Landfill on the southwestern section of the Post. The surrounding area appears to be more developed, with less open space and additional residential housing.

May 13, 1963 Aerial Photograph

The land use for the Main Post in 1963 shows minor changes from the 1957 aerial photograph. The M-2 Landfill is now clearly discernible and marked as a possible landfill. The baseball field in the open area to the west of Building 286 was removed and replaced by Building 500. The small buildings on the northeastern side of the Post adjacent to Oceanport Avenue have been removed and have not been replaced.

May 13, 1963 Aerial Photograph (M-3, M-5 and M-8 Landfills)

Changes in this aerial photograph are primarily in the M-3, M-4, M-5 and M-8 Landfills which consolidate all of the landfills into one area labeled "Site 1." There is an L-shaped dividing wall on what appears to be the border of the M-8 and M-5 Landfills. Possible debris/rubble and a light-toned surface are both noted in the northwestern portion of the M-5 Landfill. The M-2 Landfill is labeled as "Site 2 Poss Landfill" and appears to be fully delineated. A small fill area is depicted behind the Gosselin Avenue housing area within the vicinity of the current M-14 Landfill.

December 6, 1969 Aerial Photograph

The land uses for the Main Post in 1969 show several new buildings which currently exist today, namely the theater (Building 1215), bowling alley (Building 689), and Buildings 361, 362, and 363. The "Site 1" area comprising the M-3, M-4, M-5, and M-8 Landfills shows a defined boundary for the M-8 Landfill and is now labeled as a landfill. Numerous new fill areas have been noted; the first is located within a small area of the current M-18 Landfill, an additional fill area in the western portion of the M-12 Landfill, and small fill area located to the south of the 750 area. A tank cluster is identified behind the Building 116 warehouse on the Oceanport Avenue section of Main Post.

March 13, 1974 Aerial Photograph

The land use for the Main Post in 1974 reveals minor changes. The 1974 aerial photograph depicts the Main Post from M-2 and M-3 Landfills to the Oceanport Avenue area. The M-2, M-3, M-8, M-18, and M-12 Landfills appear to be undisturbed and vegetated. The M-8 Landfill appears to still be active.

March 13, 1974 – M-8 Landfill Aerial Photograph

The land use for the Main Post in 1974 focuses primarily on the M-8 Landfill. The landfill appears to be active. Both a crane and bulldozer are located on site. In addition, rubble, debris areas, and two burning stalls are visible.

4.0 PROJECT HISTORY CHRONOLOGY

- ✓ **December 1995** – The Fort Monmouth Directorate of Public Works (DPW) submitted the Roy F. Weston, Inc. (Weston) report entitled *Site Investigation, Fort Monmouth, New Jersey, Main Post and Charles Wood Areas, Site Investigation Report (SIR)*, December 1995 to the NJDEP, a copy of which is included in the Versar RIR (Exhibit I).
- ✓ **April 1996** – The NJDEP returned comments regarding the Weston SIR which stated the following regarding the landfills: “All Base landfills must comply with the New Jersey Solid Waste Management Act, N.J.A.C. 7:26-2A, et seq. If Fort Monmouth is able to document that appropriate solid waste closure procedures were followed, no additional action is required other than the NJDEP-approved long-term monitoring. However, if approved closure was not performed at the landfills, it is recommended that a minimum cover of one foot be extended over all areas of documented disposal activities. Also, approximate boundaries must be established and annotated in the Declaration of Environmental Restriction.” A copy of the NJDEP correspondence is provided in Exhibit III.
- ✓ **February 24, 1997** – Fort Monmouth DPW issued correspondence stating that the “DPW is unable to document that the former landfill sites located on the Main Post of Fort Monmouth have been closed in accordance with N.J.A.C 7:26-2A, et seq. Each of the referenced areas was covered with suitable fill material at the time of closure. All seven sites have been closed for at least 17 years and have naturally vegetated over this time period. In order to bring this issue to proper closure, the DPW proposed the collection of surface soil samples from each of the seven landfills to document that the existing cover material does not contain contaminant levels above the applicable regulatory criteria and/or establish background levels. Samples were collected in accordance with the requirements set forth in N.J.A.C. 7:26E, et seq. and the NJDEP *Field Sampling Procedures Manual* and were analyzed for TCL+30 parameters and TAL Metals.” A copy of the Fort Monmouth DPW correspondence is provided in Exhibit III.
- ✓ **July 7, 1998** – The Fort Monmouth DPW issued correspondence to the NJDEP which proposed a method to demonstrate compliance equivalence of the existing soil cover over the M-2 Landfill with regard to the Solid Waste Disposal Act of 1965. The demonstration would be accomplished by characterizing the near-surface soils. A copy of the Fort Monmouth correspondence is provided in Exhibit III.
- ✓ **August 10, 1998** - The aforementioned DPW proposal was approved by NJDEP. A copy of the NJDEP letter is provided in Exhibit III.
- ✓ **November 1998 through June 1999** – A total of 193 borings were completed at strategic locations over the site. All soil samples collected from the borings were analyzed for Target Compound List (TCL) Organics plus 30 parameters and Target Analyte List (TAL) metals. Data exceeding the laboratory method detection limit (MDL) and/or the NJDEP RDCSCC are presented in that report. Laboratory analytical data and soil boring data were provided in Versar’s RIR.

Additionally, the data were evaluated utilizing the “compliance averaging” approach to determine compliance with NJDEP RDCSCC for certain individual contaminants. *Note that compliance averaging was not able to demonstrate compliance for all applicable contaminants, and in consideration of the fact that an engineering control (i.e. capping) and institutional control (Deed Notice) are required to properly close the landfill per NJDEP requirements, compliance averaging is not considered viable and was not further pursued herein.*

5.0 REMEDIAL INVESTIGATION (RI) SITE ACTIVITIES NOVEMBER 1998 TO JUNE 1999

As discussed previously, RI activities were performed from November 1998 to June 1999. The study was conducted in accordance with the NJDEP'S *Technical Requirements* to characterize near-surface soil and assess potential risks to human health and the environment. The RI activities included the collection of near-surface soils at 193 borings (B4-B6, B13-B15, B19-B21, B25-B27 and B31-B211) at the M-2 Landfill. A total of 390 soil samples were collected from 193 borings. Soil sample depths were chosen to minimize recent soil disturbances. Each of the soil samples, except those prepared for volatile organic compound (VOC) analysis, was taken approximately 0 to 12 inches below grade surface (bgs). VOC samples were taken from 18 to 24 inches bgs because surface soils would not be expected to retain volatiles with time. The soil boring locations were located at the M-2 Landfill as identified in the 1995 Weston SIR. The locations of the borings were established in a grid like pattern within the previously designated boundaries of the M-2 Landfill.

6.0 LABORATORY ANALYTICAL RESULTS

Laboratory analyses of the samples collected at the M-2 Landfill were conducted at the Fort Monmouth Environmental Testing Laboratory (FMETL), New Jersey Certification No. 13461.

Summary - Following is a summary of the results presented in Versar's 2004 RIR. An evaluation is provided that includes a comparison to the current NJDEP NRDCSRS. Results as historically compared to May 12, 1999 criteria are presented in Table 1 of Versar's RIR.

The analytical data were summarized by Fort Monmouth representatives and presented in the following tables:

- **Table 1** - Soil Sample Collection Summary;
- **Table 2** - Soil Sampling Results Summary;
- **Table 3** - Borings in Which Detections Exceeded NJDEP NRSRS; and
- **Table 4** - Laboratory Analysis - Nonresidential Exceedance Summary.

Laboratory analytical data were also presented on plans/figures by representatives of Fort Monmouth. The figures are provided as follows:

- **Figure 2** – All Exceedances Contaminant Map, M-2 Landfill (FTMM-02) – Main Post, Fort Monmouth, New Jersey. Fort Monmouth Installation GIO. March 18, 2011.
- **Figure 3** – Metals Contaminant Map, M-2 Landfill (FTMM-02) – Main Post, Fort Monmouth, New Jersey. Fort Monmouth Installation GIO. December 10, 2010.
- **Figure 4** – PCB (polychlorinated biphenyl) Contaminant Map, M-2 Landfill (FTMM-02) – Main Post, Fort Monmouth, New Jersey. Fort Monmouth Installation GIO. March 17, 2011.
- **Figure 5** – SVOC (Semivolatile Organic Compound) Contaminant, Map M-2 Landfill (FTMM-02) – Main Post, Fort Monmouth, New Jersey. Fort Monmouth Installation GIO. December 10, 2010.
- **Figure 6** – Delineation Trenching Location Map, M-2 Landfill (FTMM-02) – Main Post, Fort Monmouth, New Jersey. FOUO. June 24, 2010.

Volatile Organic Compounds (VOCs)

The VOC samples were collected from M-2 Landfill soils at a depth of 24 inches bgs. There were no exceedances of NJDEP NRDCSRS for VOCs from the 193 soil borings. It should be noted that some Method Detection Limits (MDLs) were identified exceeding the current NRDCSRS. Although strict compliance cannot be determined at these locations, these were previously reported as nondetectable (ND) and thus would represent low level contamination, if in fact contaminants were present.

Target Analyte List (TAL) Metals

The soil samples from the 193 borings (Figure 3) were analyzed for 24 TAL metals. The samples were collected at depths of 0 to 12 inches bgs.

A summary of the metals NJDEP regulatory exceedances is presented below.

- Arsenic was detected in 10 of the site soil samples above the NJDEP NRDCSRS of 19 milligrams per kilogram (mg/kg). The exceedance concentrations ranged from a minimum of 19.4 mg/kg (B130) to a maximum of 81.3 mg/kg (B73).
- Cadmium was detected greater than the NJDEP NRDCSRS of 78 mg/kg in two soil samples (156 mg/kg at B96 and 505 mg/kg at B26).
- Lead was detected greater than the NJDEP NRDCSRS of 800 mg/kg in soil sample B32 at a concentration of 897 mg/kg.

Pesticides and Polychlorinated Biphenyls (PCBs)

Pesticide and PCB analyses were conducted on soil samples collected from the 193 borings at the M-2 Landfill (Figure 4). Each of these soil samples was collected at approximately the same depth range, i.e. 0 to 12 inches bgs. Each of the 193 borings was analyzed for 19 pesticides and seven PCB compounds.

Pesticides were not detected in the samples at concentrations greater than the NJDEP NRDCSRS.

A summary of the PCB NJDEP regulatory exceedances is presented below.

- Arochlor 1242 was detected in one soil sample exceeding the NJDEP NRDCSRS of 1 mg/kg (for total PCBs) at a concentration of 5.983 mg/kg (B178).
- Arochlor 1248 was detected in one soil sample exceeding the NJDEP NRDCSRS of 1 mg/kg (for total PCBs) at a concentration of 3.082 mg/kg (B165).
- Arochlor 1254 was detected in two soil samples exceeding the NJDEP NRDCSRS of 1 mg/kg (for total PCBs) at concentrations of 1.672 mg/kg (B155) and 1.929 mg/kg (B162).
- Arochlor 1260 was detected in two soil samples exceeding the NJDEP NRDCSRS of 1 mg/kg (for total PCBs) at concentrations of 1.764 mg/kg (B120) and 5.806 mg/kg (B190).

It should be noted that for pesticides, some MDLs were identified exceeding the NRDCSRS. Although strict compliance cannot be determined at these locations, these were previously reported as ND and thus would represent low level contamination, if in fact contaminants were present.

Semivolatile Organic Compounds (SVOCs)

SVOC analyses were conducted on soil samples collected from the 193 soil borings at the M-2 Landfill (Figure 5). Each of these soil samples was collected at approximately the same depth range, i.e., 0 to 12 inches bgs.

A summary of the SVOC NJDEP regulatory exceedances is presented below.

- Benzo(*a*)anthracene was detected in four soil samples exceeding the NJDEP NRDCSRS of 2.0 mg/kg. The exceedance concentrations ranged from a minimum of 2.2 mg/kg (B42) to a maximum of 9.5 mg/kg (B82).
- Benzo(*a*)pyrene was detected in 38 soil samples exceeding the NJDEP NRDCSRS of 0.2 mg/kg. The exceedance concentrations ranged from a minimum of 0.21 mg/kg (B36, B45, B92, B130, B144, B145, and B198) to a maximum of 10 mg/kg (B82).
- Benzo(*b*)fluoranthene was detected in three soil samples exceeding the NJDEP NRDCSRS of 2 mg/kg. The exceedance concentrations ranged from a minimum of 2.1 mg/kg (B42) to a maximum of 13.0 mg/kg (B82).
- Dibenz(*a,h*)anthracene was detected in eight soil samples exceeding the NJDEP NRDCSRS of 0.2 mg/kg. The exceedance concentrations ranged from a minimum of 0.22 mg/kg (B44) to a maximum of 2.0 mg/kg (B82).
- Indeno(1,2,3-*cd*)pyrene was detected in one sample exceeding the NJDEP NRDCSRS of 2 mg/kg at a concentration of 3.3 mg/kg (B82).

It should be noted that some MDLs were identified exceeding the NRDCSRS. Although strict compliance cannot be determined at these locations, these were previously reported as ND and thus would represent low level contamination, if in fact contaminants were present.

Fort Monmouth Plans/Figures Summary

The contaminant exceedances noted previously were presented by Fort Monmouth on Figures 1 through 4. A review of Figure 2 shows scattered exceedances of NJDEP NRDCSRS for SVOCs, metals and PCBs throughout the majority of the landfill area. Three of the 193 boring locations (B21, B42, and B82) are marked as Order of Magnitude locations, exhibiting one or more exceedances of an applicable standard by more than a factor of 10.

Figure 3 shows the presence of cadmium, arsenic and lead throughout the landfill, with one exceedance of lead, 10 exceedances of arsenic, and two exceedances of cadmium. The exceedances of metals are random and do not show patterning.

Figure 4 shows the presence of PCBs in only a few sample locations, with exceedances in six locations/sampling points. The PCB exceedances are random and do not show patterning.

Figure 5 shows 40 SVOC exceedances throughout the landfill without a distinct pattern. Three of the 193 boring locations (B21, B42, and B82) are marked as Order of Magnitude locations, exhibiting one or more exceedances of an applicable standard by more than a factor of 10.

Landfill Disruption Approval

A Minor Landfill Disruption Application was submitted to the NJDEP by Princeton-Hydro, LLC in May of 2010 for proposed borings, test pits, piezometer and well installations, groundwater injections, and gas surveys at the Fort Monmouth landfill sites. Said application was prepared for ongoing landfill delineation and investigation activities. A permit approval dated September 16, 2010 was issued by NJDEP for this proposed work. Correspondence and documentation related to the Minor Landfill Disruption Permit (including postdisturbance documentation) are provided in Exhibit IV.

7.0 DEPTH OF COVER MATERIAL

“Cover material” is defined here as soil and other materials, such as concrete, gravel, brick, sand, clay, silt, and active or discontinued structures used to contain or convey utilities, and similar materials that under normal circumstances do not pose a health or safety hazard to individuals using reasonable care. Common landfill debris found at the M-2 Landfill are not considered cover material, including cinders, glass, metal, slag, ash, and coal fragments.

Depth of cover material was derived from the logs for all 193 borings in 1998/1999 and 39 trenches/borings excavated/advanced in 2008 for the primary purpose of delineating the boundaries of the landfill. (Soil boring and trench locations are identified on Figures 2 through 6.) Soil boring logs and detailed trench logs show the depth of cover found at each boring and trench location. The boring logs are included in the Versar RIR (Exhibit I), and the trench logs are provided in Exhibit V. In addition, a summary of the cover material is provided in Table 5.

Summary of Findings

- a. The average depth of cover at M-2 is 29.3 inches;
- b. Depth of cover throughout the landfill varies from a maximum of 120 inches (Borings 37 and 38) to a minimum of zero cover (Trenches 19 and 20);
- c. 68.54 percent (146 out of 213) of boring/trench logs show depth of cover greater than 24 inches; and
- d. Nearly 75 percent of boring/trench locations (160 of 213) show cover greater than 20 inches.

8.0 PROPOSED FINAL REMEDIAL ACTION

As noted in this report, concentrations of SVOCs, PCBs and metals in soil were detected at concentrations exceeding the NJDEP NRDCSRS. Additional analysis of the analytical results did not define a “source area” or level of contamination that necessitated the identification and evaluation of potential remedial actions other than the permanent closure of the landfill.

To address the exceedances of analytes that did not meet cleanup requirements in the near surface soils, the DPW will incorporate a Deed Notice into the Fort Monmouth Master Plan for these soils. This shall include the entire area of the defined landfill.

Given the inactive and undisturbed status of the landfill, the performance of long-term surface water and groundwater monitoring proximate to the M-2 Landfill, the negligible impacts reported to date, the lack of groundwater use at or downgradient of the M-2 Landfill, and the low concentrations of contaminants of concern in the shallow surface soils across the site, No Further Action is recommended for the previously evaluated near-surface soils at the M-2 Landfill with the exception of the proposed capping.

It is recommend, however, that the landfill delineation along the southern edge of M-2 be completed via trenching/borings and that supplemental soil borings and sampling be performed in the "additional" landfill areas identified during the 2008 trenches/borings (and not evaluated in the 1998 investigation). It is also recommended that supplemental borings/trenches be performed in order to complete this delineation. Please note that the southern edge of the M-2 Landfill is in the immediate vicinity of off-site property; therefore, delineation trenches/borings appear to require off-site access.

As per the November 17, 2010 “NJDEP Regulatory Requirements for Fort Monmouth Landfills (Regulatory Requirements)” provided in Exhibit III, it is proposed that an additional 12 inches of clean soil cover material be placed throughout the M-2 Landfill. This work should be completed subsequent to the full delineation/assessment of the landfill as recommended above.

A capping plan shall be prepared that allows for proper drainage, facilitate growth of vegetation, and ensures that the cover is durable. Should areas of significant surface contamination be encountered during the site capping activities, then “hot spot” removals shall be undertaken as required in the aforesaid November 17, 2010 NJDEP Regulatory Requirements. This proposed capping action is an appropriate and prudent additional measure that will provide an ample physical barrier to direct contact by persons and wildlife that may traverse the area and undertake reasonably expected activities.

Brinkerhoff recommends that a formal Landfill Closure Plan including the above recommendations be submitted for NJDEP review and approval.

9.0 REFERENCES

Remedial Investigation Report for Near Surface Soils – M-2 Landfill Site Ft. Monmouth, New Jersey; Versar, Inc., February 23, 2004.

Site Investigation, Fort Monmouth, New Jersey, Main Post and Charles Wood Areas, Site Investigation Report, Roy F. Weston, Inc., December 1995.