



State of New Jersey

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BOB MARTIN
Commissioner

KIM GUADAGNO
Lt. Governor

April 29, 2013

Joe Pearson
Calibre Systems
1119 Canterbury Dr.
Lansdale, PA 19446

Re: Draft Finding of Suitability to Transfer (FOST) dated March 2013
Charles Wood Area
Fort Monmouth, New Jersey
PI G000000032

Dear Mr. Pearson:

The New Jersey Department of Environmental Protection (Department) has completed review of the referenced document, submitted in support of the suitability for transfer of the bulk of Parcels B, C1, C, F, Howard Commons, and the Golf Course Parcel, the majority of which are contained within the property known as the Charles Wood Area. Parcel B is located on the western portion of the Main Post. The following comments are offered.

Section 2. Property Description

Page 2, paragraph 2, as you indicated on April 22, 2013, the reference to Area 400 is to be removed. Also on page 2, in the midpoint of paragraph 2, it is indicated the southeast corner of CWA was developed for R&D. Shouldn't this read *southwest*?

Section 4. Environmental Condition of Property

Parcel 28 – The narrative indicates some parts of this parcel remain a Category 7 (which are further explained in Section 5.2), or are not categorized. It does not appear the uncategorized area of Parcel 28 (the location of a former UST) is described anywhere within the document, nor is documentation regarding sampling of this area available; sampling is recommended. Additionally, former USTs 2542-29 and 2564-32, although referenced as no release or no contamination observed, were apparently not evaluated via sampling. Therefore, this office cannot concur with the determination there was no discharge in these areas. The Department recommends sampling in accordance with applicable NJDEP regulations and guidance documents.

Parcel 35 – As indicated in previous (July 23, 2012) correspondence, it was determined Appendix O of the January 2007 ECP Report indicated the presence of a former UST as adjacent to Building 2560. As no evaluation of the UST has apparently been performed in accordance with applicable NJDEP regulations and guidance documents, the Department is unable to concur with the determination there was no discharge in the area of this UST, and is therefore unable to concur with the designation of Category 1 in the area of the UST.

Parcel 36 – UST 1203 is listed in Enclosure 5, Table 3, page 6 as being removed on November 1, 2009. Although the Table states “no indication of release”, the evaluation report does not appear to have been submitted. Therefore, the Department is unable to concur with the determination there was no discharge or designation of Category 1 in the area of this UST.

Section 4.1.1 Installation Restoration Program

Golf Course PCB Site (CW-7) – FTMM-29 – page 9, third and fourth lines – It is suggested the sentence beginning on line three be reworded to read similar to “A draft deed notice has been submitted to and approved by the NJDEP on January 31, 2013, and is to be filed once the property actually transfers.” Regarding the fourth line, the NJDEP has not issued a Conditional NFA letter, but rather an approval of the draft deed notice, which is to be filed upon property transfer (followed by application for Remedial Action Permit).

Section 4.3.1 Underground and Above-Ground Storage Tanks (UST/AST)

Reported Releases from USTs – page 13 – Building 2044 was listed in previous reports as a Pesticide Storage Building, rather than Residential. Building 2067 should be included, as Appendix G indicates results from the tank investigation initially exhibited TPH to 20,800 ppm in the soil, prior to receiving a Closure Approval designation on January 10, 2003.

Section 4.4 Polychlorinated Biphenyls (PCB)

Officer's Club, Building 2000, Page 14 – The 0.049 and 2 milligrams per kilogram (mg/kg) referenced represent the Residential Direct Contact *Soil Cleanup Criteria* (RDCSCC) and Non-Residential Direct Contact *Soil Cleanup Criteria* (NRDCSCC). The approved draft Deed Notice will be *filed* once the property has been transferred.

Section 5.1 Carve Out Areas Needing Further Remediation

Wastewater Treatment Lime Pit (CW-1) – FTMM-22 – page 23, 3rd paragraph, 2nd to last sentence - The document seems to indicate the lime pit has been entirely removed during demolition activities. The base of the pit, however, I believe remains in place at this time.

Enclosure 3, Table 1 – Description of Property

Parcel 28, page 3, Remedial Actions – It is agreed ten former fuel oil USTs received designations of no further action necessary. As indicated in the February 22, 2013, correspondence, however, USTs 2564-32 and 2542-29, although reportedly evidencing no visual

contamination, do not appear to have been sampled; therefore, this office cannot concur with the designation of no discharge, nor concur with a Category 1 designation for the area of these two USTs. The Department believes sampling is necessary. Additionally, no mention is made nor description provided of the non-categorized area within the parcel shown in the Site Map in Enclosure 1; again, sampling is warranted.

AAFES Gasoline Station (FTMM-58)- page 5 – Second to last sentence under the *Remedial Actions* column – “...are considered non-impacted and are part of this FOST and are considered a Category 1.” The Category should read Category 2, rather than Category 1, correct? If this is not accurate, please provide the date of DEP concurrence.

Child Development Center, Teen Center, Pool and Former Sewage Treatment Plant – page 5 – The septic tank in need of investigation, and which is not included in this FOST/transfer (carve-out), is not referenced under the Remedial Actions column, as carve-outs are in the other parcels. As noted, this office cannot concur with the designation of no discharge, nor concur with a Category 1 designation, relative to the area of the UST noted on Appendix O of the January 2007 ECP Report as adjacent to Building 2560, without evaluation in accordance with the applicable NJDEP regulations and guidance documents.

Military Army Prep School and Offices – page 6 – The UST previously located at Building 1203 was reportedly removed on November 1, 2009. Although no evidence of a discharge was apparently evident, unless all tanks, former or current, have been evaluated in accordance with the applicable regulations and guidance documents (including submittal of documentation for review), the NJDEP cannot concur with the designation of no discharge, nor concur with a Category 1 designation for the area of the former UST.

Enclosure 4, Table 2 – Notification of Hazardous Substance Storage, Release or Disposal FTMM-29 (CW-7) – page 1 - Remedial Actions – The fourth and fifth lines reference residential and industrial *screening* criteria. Please change the phrasing to read *cleanup* criteria rather than screening criteria.

Building 2700 (ECP Parcel 15) – page 1- does the former PCB transformer area not require inclusion on this table?

2700 Meyer Center (FTMM-22 – CW-1) – page 2 – Remedial Actions – first two words should read “Quality Standards”, rather than “Quality Criteria”. Line 14 – typo; “area” should read “are”.

Enclosure 5, Table 3 – Notification of Petroleum Product Storage, Release, or Disposal Former USTs 2542-29 and 2564-32, on Parcel 28, are listed as no release or contamination observed, however, no sampling was apparently performed. No report of evaluation was submitted for former UST UST-2544 on Parcel 28 (non-characterized area Enclosure 1), nor for UST-2560 on Parcel 35, which are not included on the Table, nor apparently for UST-1203 on Parcel 36. As previously indicated, without same, the Department is unable to concur with the determination that no discharge was associated with these USTs.

Page 2 – Building 2067-37 – Date and Remedial Action - Appendix G of the US Army BRAC 2005 ECP Final Report dated January 27, 2007 (Appendix G) indicates the UST, as well as contaminated soil, were removed on May 16, 1994; the NJDEP Closure Approval is dated January 10, 2003.

Page 2 – Buildings 2231 through 2240 & Building 2260 – These buildings were contained within that portion of Parcel 35 previously transferred.

Enclosure 8 Environmental Protection Provisions

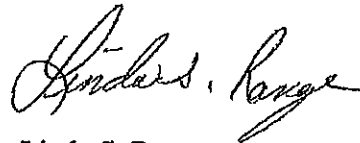
1.A.2) Land Use Restriction – third and fourth lines – change “Soil Remediation Standards” to “Soil Cleanup Criteria”, as these were the criteria in effect at the time of remedial activities and approval.

EPP Attachment 1

Site Maps – Land Use Restriction Map – Gibbs Hall Building 2000 – As above, the remediation numbers applicable to the area of concern at the time of remediation were the Residential and Non-Residential *Soil Cleanup Criteria*, rather than the Soil Remediation Standards. Please change line two of the figure’s title (to reflect RDCSCC Limit = 0.49 mg/kg), as well as that within the parenthesis beneath the “Legend” box (to reflect “Area Outside of Proposed Deed Notice Boundary Meets NJDEP RDCSCC”).

Please contact this office if you have any questions.

Sincerely,



Linda S. Range

C: Wanda Green, BRAC Environmental Coordinator
Rich Harrison, FMERA
Julie Carver, Matrix