



State of New Jersey

CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

DEPARTMENT OF ENVIRONMENTAL PROTECTION
Bureau of Case Management
401 East State Street
P.O. Box 420/Mail Code 401-05F
Trenton, NJ 08625-0028
Phone #: 609-633-1455
Fax #: 609-633-1439

BOB MARTIN
Commissioner

May 31, 2016

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

Re: Finding of Suitability to Transfer (FOST) dated April 2016
Fort Monmouth – Phase 2 Parcels
Fort Monmouth, New Jersey
PI G000000032

Dear Mr. Pearson:

The New Jersey Department of Environmental Protection (Department) has completed review of the referenced FOST, received on April 28, 2016, for the Phase 2 Parcels. Approximately 460 of the 562 acres are to be transferred, while 102 acres are to be “carved out” of this transfer, and will undergo additional remedial efforts. The Phase 2 parcels are shown in Enclosure 1, Figure 2 of the Draft FOST. Comments are as follows:

Section 4. Environmental Condition of Property

As Parcel 93 is being kept as a carve out, the parcel/UST should perhaps be removed from this section, as well as Table 1.

Section 4.3.1 Petroleum and Petroleum Products

Table 4-2 – Former USTs Needing Groundwater Evaluation

- Parcel 51 – DEP comments are pending review of submittal

Table 4-3 – Former USTs Needing Soil Evaluation Action Carve Outs

- Parcel 68 – the UST number provided is 906A (906-232), however 906-232 was NFAed on August 29, 2000. Based upon information contained in the files and supported by the carve out map, it appears the referenced UST should read 906A (906-146).

Section 4.4 Polychlorinated Biphenyls

FTMM-47 – Former PCB Transformer Sites – It is understood the Army is pursuing additional remedial efforts at Buildings 1002, 1208 and 1209, which are noted as carve outs and not

included in the current transfer. It is unclear, however, why Building 292, also included in the description of FTMM-47 in the '07 ECP and undergoing additional remedial efforts, is not included in this paragraph.

Pole-Mounted PCB Transformer Leak, Buildings 454 and 455 – ECP Parcel 95 – The title references Buildings 454 and 455, while line three (and file information) references Buildings 454 and 456.

Former Building 623, Former Central PCB Storage Facility - NJDEP concurred with proposed no further action on May 9, 2016.

Section 5.2, Table 5-2 – Carve Outs Requiring Further Investigation

Several of the parcels are to be partially transferred, with only a portion to be carved out and retained by the Army to undergo additional remedial efforts. That is not clear, however, in the left column for a large number of those parcels which are not being carved out of the transfer in their entirety. It is recommended words similar to “portion” (as was done for Parcels 57 and 83), or “part of” be included with the parcel number for the following partial parcels, to assist in clarifying the parcel is being only partially carved from the transfer

- 51 - Former USTs 616 and P51-G12 (2 separate areas)
- 51 - Motor Pool Area at Building 750
- 57 - Former coal Storage & Railroad Unloading Area
- 65 - FTMM-66 AST at Building 886
- 68 - UST 906A
- 79 – Former ASTs at Area 74 (Area 75 according to several files)
- 79 – UST 490
- 83 – Former Industrial and Vehicle-Related Activities

Additionally, “part of” Parcel 55 should be inserted into Table 5-2, specifically Building 1002 (PCBs).

Enclosure 1, Figure 2 – Phase 2 Property

Certain parcel boundary designations have been seemingly revised from that shown in Figure 19 of the '07 ECP submittal, additional parcels have been created, and/or various areas of concern denoted within certain parcels (e.g. Bldg.750 Motor Pool Area, UST906A). Boundaries have been created for the numerous carve outs for property requiring additional remedial activities and not considered a part of this FOST. This office has not reviewed the information utilized in creating those boundaries, however, (nor in several cases even seen the boundaries prior to this submittal), and cannot comment as to whether the boundaries are appropriate. This is particularly of concern for those parcels whose boundaries have changed, or which are being apportioned, e.g. Parcels 65, 79, 83. Based on information for Parcel 83 in this office it is unclear all affected material is contained within that area noted as carve out 83.

Although it is understood Parcel 103 was apparently created to address contamination noted by the '08 ECP Site Investigation sample locations P83-SB12 and P83-SB13, the location on Figure

2 does not entirely appear to coincide with the locations on Figure 3.21-1 of the '08 ECP SI. It is also unclear how '08 ECP SI sample location P83-SB-6 (with benzo(a)pyrene at 3-3.5') was addressed.

Enclosure 3, Table 1 – Description of Property

Parcel 39 - Building 1150 (Vail Hall)

DEP issued an approval letter, concurring that all remedial activities are complete, no additional remedial action is necessary for the Parcel.

Parcel 47- FTMM-19/AOC 3 – Former MP Sanitary Treatment Plant

The description regarding the status of FTMM-19 is not in complete in accordance with this office's understanding. File information indicates FTMM-19/AOC 3 was granted the designation of no further action in April of 1996. FTMM-19 has consistently been considered closed/NFAed since that time, while Parcel 47 continued to contain an area of concern (Former Pistol Range) in need of evaluation. It is understood the Former Pistol Range is now carved out of Parcel 47, and is designated Parcel 105, however, it does not appear it should be affiliated with FTMM-19.

Parcel 51

Requested UHOT documentation has been submitted, however, comments are pending review.

The second paragraph in Parcel 51 references a small carve out associated with the RCE investigation, which was re-designated Parcel 98. Why is no specific mention made of the several other carve-outs made from this parcel, i.e., Parcel 96 (Building 700), Building 750 Motor Pool Area, UST 616 (based on findings included in the above referenced report which is pending review), and SI Sample P51-G12 Area?

Parcel 53

The Army has determined the low levels of PAHs found within the parcel are due to "anthropogenic conditions". As you are aware, this office does not agree the source of the PAHs exceedances has been established at this time, and is therefore not in agreement with this determination, nor the parcel's classification as a Category 2 (although it does not appear to be listed under Section 4. Environmental Condition of Property, pages 2-4). Potential sources referenced for the PAHs have also included former asphaltic pavement or historic fill, each feasible, but neither proven at this time. If the material is of historic fill origin, the material is considered an area of concern under the Technical Requirements for Site Remediation, N.J.A.C. 7:26E and must be investigated and addressed accordingly. Therefore, as the source of the exceedances are not yet known (and delineation is incomplete), in accordance with the Technical Requirements, additional remedial efforts are required.

Additionally, elevated levels of pesticides are found. Although the pesticides were historically applied in a manner consistent with their intended use, levels are present above applicable standards, and require additional remedial efforts pursuant to New Jersey regulations and policy.

Parcel 55

The parcel is listed as Condition Categories 2/5. As per the conversation with Joe Pearson the afternoon of May 27, 2016, that area designated a Category 5, Building 1002 (associated with FTMM-47) is a carve out from the transfer. This Parcel (portion of this parcel) should also be added to Table 5-2 (Carve Outs Requiring Further Investigation), and an amendment made to Figure 2 Phase 2 Property map, outlining the affected area.

Parcel 74

The “Remedial Actions” column indicates “Closure approvals NA for UST 204-4 and UST-287-61.” The DEP concurred with no further action necessary for these USTs on September 28, 2015.

Parcel 79

Under the “Remedial Actions” column, first paragraph, second to final sentence, it is stated “no additional actions were recommended for the site.” The DEP did not approve of this recommendation, and as the following sentence indicates, additional remedial action is being performed.

Second paragraph – In addition to further evaluation of former tank 490-58, USTs 202a and 202d also require additional soil and ground water evaluation. This office also does not agree with the final sentence of this paragraph, “all other tanks have received NFA from NJDEP”. As per the DEP correspondence of August 25, 2015, many USTs are referenced which are not NFAed, some of which require a ground water investigation, others which have had no evaluation performed.

Parcel 83

The seventh line of “Remedial Actions” states arsenic was not considered a COC due to naturally occurring and anthropogenic influences. However, correspondence from this office dated July 10, 2012 and June 16, 2015 stated arsenic did NOT appear to be naturally occurring and must be included in a remedy. The July 10, 2012 letter also requested the additional soil sampling and delineation efforts include not only BNs, PCE and metals but also PCBs analysis.

Second paragraph – As a reminder, the October 13, 2015 letter designating no further action necessary at USTs 273-65,66,67 was applicable to the USTs only, not the dispenser/s, which were reported as used with the AST fuel storage system which replaced USTs 273.

Enclosure 5 – Table 3 – Notification of Petroleum Product Storage, Release or Disposal

UST-116-9 & 110 – page 2

It is agreed each UST received the appropriate NJDEP closure letter. The NJDEP closure approval letter dates provided under Remedial Actions, however, are not in accordance with those provided in Appendix G of the 1997 ECP Report.

200 Area (1-3 Allen Ave) – page 3

As this UST has not been evaluated in accordance with the applicable regulations and guidance documents, the NJDEP cannot comment as to the absence or presence of a petroleum discharge.

UST-202-a through d – pages 3,4

As per information provided in the April 2015 *USTs within ECP Parcel 79* and the *Parcel 79 Response to Comments and Workplan Addendum* submittal received February 2016, it was USTs 202-b and 202-c which were granted designations of no further action.

UST 208-6 – page 4

It appears a typo exists in the NJDEP closure approval letter date, which should read 1/10/03.

UST-208-210 – page 4

NJDEP concurred with NFA on January 10, 2003. No record of additional information being submitted in April 2015 was found.

USTs-273-66 & 67 – page 9

As indicated above, the October 13, 2015 letter designating no further action necessary at USTs 273-66,67 was applicable to the USTs only, not the dispenser/s, which were reported as used with the AST fuel storage system which replaced USTs 273.

UST-283-58 – page 9

For clarification, the third column indicating “case closed” is an Army designation only, not a NJDEP designation.

The following USTs on pages 4-11 have either not undergone evaluation in accordance with the applicable regulations and guidance documents, or have not submitted a report to the NJDEP; the NJDEP can therefore not provide comment as to the absence or presence of a petroleum discharge.

UST 211-9, UST, 212-10, UST-213-11, UST 214-12, UST-219-13, UST, 220-14, UST-222-15, UST-223-16, UST-225-17, UST-226-18, UST-227-19, UST-228-20, Building 228, UST-234-22, UST-235-23, UST-236-24, UST-238-26, UST-239-27, UST-240-28, UST-241-29, UST-242-30, UST-243-31, UST-244-32, UST-245-33, UST-247-34, UST-248-35, UST-249-36, UST-250-37, UST-251-38, UST-252-39, UST-253-40, UST-254-41, UST-255-42, UST-256-43, UST-258-44, UST-360-70, UST-361-71, UST-362-72, UST-363-73, UST-364-74

UST-447-47 – page 13

Although not included in Table 3, it appears perhaps this UST, granted an NFA designation on August 29, 2000, was also located within that area to be transferred?

UST-676-104 – page 21

It appears insufficient information was provided to allow for comment by the NJDEP.

UST-692-110 – page 2

Although it is stated the site was closed by NJDEP, no record was found to confirm same.

UST-699-185 – page 22

The “Remedial Actions” column appears to indicate the ground water recovery treatment system remains online. The NJDEP approved cessation of the pump and treat system due to decreasing levels of contamination in the ground water in April of 2013. Remedial efforts do remain ongoing.

UST-699-197 – page 23

Although it is indicated NJDEP approval was provided in a telephone record dated January 1994 (not confirmed by this office), it appears TPH levels remain at significant levels, over 11,000 ppm.

UST-700-75 – page 23

Insufficient information has been provided to the NJDEP to allow for comment as to the absence or presence of a petroleum discharge.

UST-701-113 – page 24

The “Remedial Actions” states the site was closed by the NJDEP, however, no date is provided in Appendix G of the '07 ECP, nor could the action be confirmed by this office.

UST-702-114 – page 24

There is no record of a designation of NFA.

UST 800-21 – page 26

The NJDEP responded on November 10, 2015 indicating a ground water investigation is required.

UST-1004-158 – page 29

No record of the referenced NJDEP site closure was found.

UST-122-230 – page 32

No record of the closure report referenced as submitted in September 2001 was found;

The parcels affected by the FOST contain no Classification Exception Areas (CEAs). Unless a CEA has been established at a given area, no restrictions on the use of the ground water beneath the site have been placed by the NJDEP, no written approval for access to or use of the water is required, and the NJDEP should be removed from any reference in Sections 1A through 1D.

Attachment 1 - Monitoring Well Location Map


The color coding is at times unclear and does not appear to entirely correlate to Figure 2 Phase 2 Map (e.g. Parcel 53 is shown as carved out on one map, not the other); several landfills are not tinted the legend denoted yellow, while areas within Parcel 49 (not landfill) are tinted yellow..

Miscellaneous

Section 4, page 4, ECP Category 4; Parcel 95 – page 11 indicates the Building as 455, rather than 456

Figure 2 – Phase 2 Property – Parcel 50 appears to be of a different size than the original – Figure 19 of the '08 SI. Although this is not of concern at this time, as the surrounding parcel (Parcel 49) is also considered a carve out, it may become of concern at a later date.

Please contact this office if you have any questions.

Sincerely,

Linda S. Range

C: William Colvin, BEC
James Moore, USACE
Rick Harrison, FMERA
Joe Fallon, FMERA
Frank Barricelli, RAB