New Jersey Department of Environmental Protection
Site Remediation Program

Report Certifications for RCRA GPRA 2020, CERCLA, and Federal Facility Sites

These certifications are to be used for reports submitted for RCRA GPRA 2020, CERCLA, and Federal Facility Sites. The Department has developed guidance for report certifications for RCRA GPRA 2020, CERCLA, and Federal Facility Sites under traditional oversight. The "Person Responsible for Conducting the Remediation Information and Certification" is required to be submitted with each report. For those sites that are required or opt to use a Licensed Site Remediation Professional (LSRP) the report must also be certified by the LSRP using the "Licensed Site Remediation Professional Information and Statement". For additional guidance regarding the requirement for LSRPs at RCRA GPRA 2020, CERCLA and Federal Facility Sites see http://www.nj.gov/dep/srp/srra/training/matrix/quick_ref/rcra_cercla_fed_facility_sites.pdf.

Document: "Response to NJDEP Comments on Parcel 49- Revised LWPA"

PERSON RESPONSIBLE FOR CONDUCTING THE REMEDIATION INFORMATION AND CERTIFICATION

Full Legal Name of the Person Responsible for Conducting the Remediation: William R. Colvin
Representative First Name: William Representative Last Name: Colvin
Title: BRAC Environmental Coordinator
Phone Number: (732) 380-7064 Ext: Fax:
Mailing Address: P.O. Box 148
City/Town: Oceanport State: NJ Zip Code: 07757
Email Address: william.r.colvin18.civ@mail.mil

This certification shall be signed by the person responsible for conducting the remediation who is submitting this notification in accordance with Administrative Requirements for the Remediation of Contaminated Sites rule at N.J.A.C. 7:26C-1.5(a).

I certify under penalty of law that I have personally examined and am familiar with the information submitted herein, including all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, to the best of my knowledge, I believe that the submitted information is true, accurate and complete. I am aware that there are significant civil penalties for knowingly submitting false, inaccurate or incomplete information and that I am committing a crime of the fourth degree if I make a written false statement which I do not believe to be true. I am also aware that if I knowingly direct or authorize the violation of any statute, I am personally liable for the penalties.

Signature: William R Colvin Date: 8/08/2016

Name/Title: William R. Colvin / BRAC Environmental Coordinator

DEPARTMENT OF THE ARMY

OFFICE OF ASSISTANT CHIEF OF STAFF FOR INSTALLATION MANAGEMENT
U.S. ARMY FORT MONMOUTH
P.O. 148
OCEANPORT, NEW JERSEY 07757

August 8, 2016

Ms. Linda Range
New Jersey Department of Environmental Protection
Bureau of Case Management
401 East State Street
PO Box 420/Mail Code 401-05F
Trenton, NJ 08625-0028

SUBJECT: Revised Letter Work Plan Addendum for Parcel 49, Former Squier Laboratory and other facilities, Fort Monmouth, New Jersey

Dear Ms. Range:

The purpose of this Revised Letter Work Plan Addendum (RLWPA) is to address comments provided by the NJDEP in your letter dated July 29, 2016 and to provide an overview of the RLWPA for Parcel 49. This RLWPA proposes additional borings to augment previous environmental investigations conducted at Parcel 49, Former Squier Laboratory and other facilities, located within the Main Post (MP) of Fort Monmouth (FTMM).

Work performed under the Rev.1 Environmental Condition of Property (ECP) Work Plan (WP) and approved by NJDEP in a December 2015 letter included the collection and analysis of soil samples from ten soil borings for PAH analysis, and six soil borings for PCB analysis, as shown on **Figure 1.7**. Soil samples were collected as described in the ECP-WP. Based on the results, detections of PAHs and PCBs have been delineated horizontally and vertically at the sampling locations, except for PAHs at PAR-49-SS-07 and PAR-49-SS-09. As agreed in the NJDEP July 29, 2016 letter, horizontal delineation of PAHs northwest of building 291 will consist of advancement of three primary borings (PAR-49-SS-13, PAR-49-SS-14 and PAR-49-SS-15) and two contingency borings (PAR-49-SS-16 and PAR-49-SS-17) as shown on **Figure 1.7** (Buildings on Parcel 49 present limitations for drilling, and locations may change as necessary based on actual field conditions). Up to three samples will be collected from each of these boring as described in **Table 1**. Primary samples will be run for PAHs, and contingency samples will be extracted, held, and run for PAHs pending results of the primary samples.

Additionally, the July 29, 2016 letter states that the NJDEP is not in agreement with the Army's position that PAH exceedances of the RDCSRS in surface soils at borings P49-SS10 through SS13 are the result of diffuse anthropogenic pollutants (DAP), and notes that nearby sample P49-SB1/SS1 exceeded the RDCSRS for PAHs in the 6 to 6.5 feet bgs interval. The Army maintains the position that the low concentrations of PAHs in the surface soils are the result of DAP and are not the result of a release, and therefore do not require investigation. Additionally, P49-SB1/SS1

is located adjacent to Landfill FTMM-18 and the low concentrations of PAHs at 6 to 6.4 feet may be the result of fill and or landfill in this area, and not attributable to a release at Parcel 49. However, FTMM will perform limited additional characterization to provide evidence that these exceedances are not attributable to a release, but instead are low level exceedances representative of DAP or anthropogenic background in this area. To delineate or provide further evidence of DAP at the surface PAH exceedances, the limited additional characterization will consist of drilling four soil borings (PAR-49-SS-18, SS-19, SS-20, and SS-21) as shown on **Figure 1.7** will be advanced around the area of the exceedances and collection of soil samples. Samples will be collected at the surface (in the 6 inch interval below the asphalt and subbase) and in subsurface soil as described in **Table 1**. At the one location where PAHs were found at 6 to 6.5 feet, the limited investigation will consist of drilling one vertical delineation boring (PAR-49-SS-22) adjacent to existing boring P49-SB1/SS1 to vertically delineate the PAHs at 6 to 6.5 feet, and four additional step-out borings (PAR-49-SS-23, SS-24, SS-25, and SS-26) around the vertical boring location. At the vertical delineation boring, soil samples will be collected from 9 to 9.5 feet. At the four additional step-out borings, samples will be collected from 6 to 6.5 feet for horizontal delineation. These sample results will be used to determine if there is any evidence that these PAH exceedances could be attributed to a release (e.g., higher concentrations and a concentration gradient) at Building 293.

We look forward to your review of this proposed sampling plan, and approval or additional comments. The technical Point of Contact (POC) for this matter is Cris Grill at (617) 449-1583 or by email at cris.grill@parsons.com. Should you have any questions or require additional information, please contact me by phone at (732) 380-7064 or by email at william.r.colvin18.civ@mail.mil.

Sincerely,

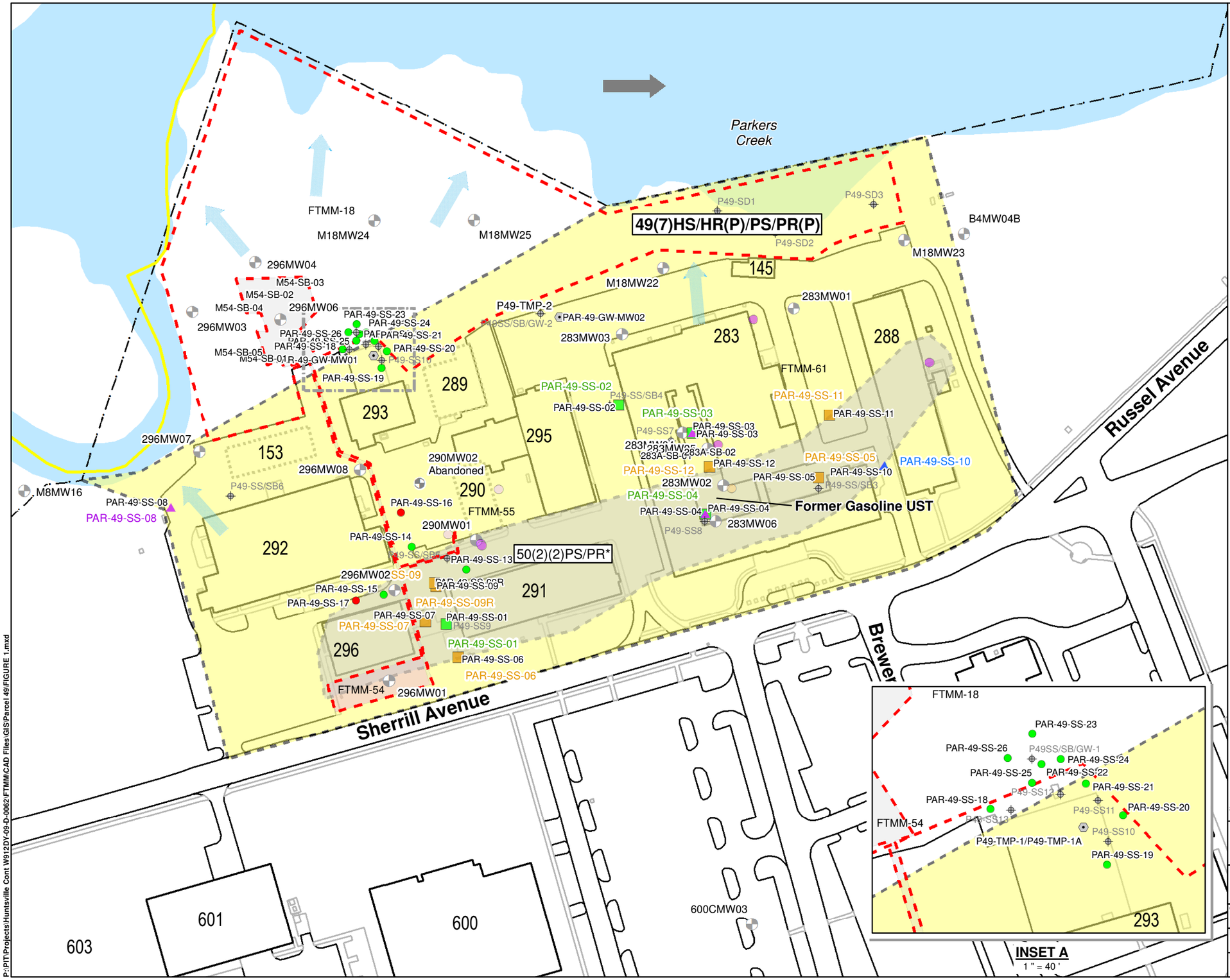
William R. Colvin, PMP, CHMM, PG
BRAC Environmental Coordinator

Attachments:

Figure 1.7 Parcel 49 Layout and Sampling Locations
Table 1 Sampling Summary for Parcel 49 Revised Letter Work Plan Addendum

cc: Linda Range, NJDEP (3 hard copies)
Delight Balducci, HQDA ACSIM (e-mail)
Joseph Pearson, Calibre (e-mail)
James Moore, USACE (e-mail)
Jim Kelly, USACE (e-mail)
Cris Grill, Parsons (e-mail)

Figure 1.7
Parcel 49 Layout and Sampling Locations



LEGEND:

- Historic Sampling Location
- Temporary Monitoring Well Location (2010)
- Surface/Subsurface Soil Sample Location (for analysis of polychlorinated biphenyls PCBs) (2016)
- Surface/Subsurface Soil Sample Location (for analysis of polycyclic aromatic hydrocarbon [PAHs]) (2016)
- Surface/Subsurface Soil Sample Location (for contingent analysis of PCBs) (2016)
- Surface/Subsurface Soil Sample Location (for contingent analysis of PAHs) (2016)
- Former Gasoline UST
- Removed Fiberglass UST associated with FTMM-55 (Building 290)
- Removed Steel UST associated with FTMM-55 (Building 290)
- UST Excavation Area (FTMM-54)
- Former Fuel Distribution Piping Excavation
- Parcel 49 Boundary
- Parcel 50 (not included in Site Investigation)
- Shallow Monitoring Well
- FTMM-18 / FTMM-54 Boundary
- Municipal Boundary
- Installation Boundary
- Generalized Groundwater Flow Direction
- Surface Water Flow Direction
- Contigency Subsurface Sample
- Subsurface Sample

N

1 inch = 120 feet

0 60 120 240 Feet

Source: FTMM Supplied CAD, 2013; U.S. Army BRAC, 2008; USGS NHD, 2012.

PARSONS 401 Diamond Drive NW, Huntsville AL	**Fort Monmouth** **New Jersey**

PARCEL 49 LAYOUT AND SAMPLING LOCATIONS

CREATED BY: RR	REVIEWED BY: ME
DATE: AUG. 2016	FIGURE NUMBER: FIGURE 1.7
PROJECT NUMBER: 748810-06015	FILE: FIGURE 1.mxd

P:\PIT\Projects\Huntsville Cont W912DY-09-D-0062\FTMM\CAD Files\GIS\Parcel 49\FIGURE 1.mxd

Table 1
Sampling Summary for Parcel 49 Revised Letter Work Plan Addendum

TABLE 1
SAMPLING SUMMARY FOR PARCEL 49 REVISED LETTER WORK PLAN ADDENDUM
FORT MONMOUTH, NEW JERSEY

Site	Location	Field Meter Readings [a/]	PAHs by Method 8270 SIM	Rationale
Soil				
Parcel 49	Primary Borings (Figure 1.7): 3 soil borings (PAR-49-SS-13, PAR-49-SS-14 and PAR-49-SS-15), 3 samples each.	3 borings	9	Surface soil samples (0 to 6-inch interval below the asphalt and asphalt base material) will be collected from PAR-49-SS-13, PAR-49-SS-14 and PAR-49-SS-15 taking care not to introduce asphalt and/or road base into the samples. In addition, samples will be collected from a 6 inch interval within the 2-3 foot depth interval, and at a depth interval immediately above water table to evaluate the vertical extent of PAHs.
	Contingency Borings (Figure 1.7): 2 soil borings (PAR-49-SS-16 and PAR-49-SS-17), 3 samples each.	2 borings	6	Surface soil samples (0 to 6-inch interval below the asphalt and asphalt base material) will be collected from contingency borings PAR-49-SS-16 and PAR-49-SS-17 taking care not to introduce asphalt and/or road base into the samples. In addition, soil will be collected from a 6 inch interval within the 2-3 foot range, and at a depth interval immediately above the water table to evaluate the vertical PAHs extent. Samples will be extracted, held and ran only be analyzed as needed based on the results of primary samples.
	Primary Borings (Figure 1.7): 4 soil borings (PAR-49-SS-18, PAR-49-SS-19, PAR-49-SS-20 and PAR-49-SS-21), 2 samples each.	4 borings	8	Surface soil samples (0 to 6-inch interval below the asphalt and asphalt base material) will be collected from PAR-49-SS-18, PAR-49-SS-19, PAR-49-SS-20 and PAR-49-SS-21 taking care not to introduce asphalt and/or road base into the samples. In addition, samples will be collected from a 6 inch interval within the 3 to 4 foot bgs range (unless the water table is encountered at a shallower depth, in which case the sample will be collected in the 6 inch interval above the water table, or if evidence of contamination is observed the sample will be collected based on field observations). If evidence of contamination is observed an additional sample will be collected below any evidence of contamination.
	Primary Borings (Figure 1.7): 5 soil borings (PAR-49-SS-22, PAR-49-SS-23, PAR-49-SS-24, PAR-49-SS-25, and PAR-49-SS-26), 1 sample each.	5 borings	5	Subsurface soil samples will be collected from PAR-49-SS-22 at depths of 9 to 9.5 feet to vertically delineate the sample collected at 6-6.5 ft (if there is visible evidence of contamination at the 9 ft sampling interval, the sample should be collected at a depth below any evidence of contamination). Subsurface soils will be collected at 6-6.5 ft bgs in surrounding step-out borings PAR-49-SS-23, PAR-49-SS-24, PAR-49-SS-25, and PAR-49-SS-26. If evidence of contamination is observed an additional sample will be collected below any evidence of contamination
QA/QC samples (see SAP for additional details) [b/]				
Field Duplicates (5% Sampling Frequency per media)		NA	2	
Matrix Spike (5% Sampling Frequency per media)		NA	2	
Matrix Spike Duplicate (5% Sampling Frequency per media)		NA	2	
Trip Blank (1 per cooler of VOCs per media)		NA	0	
QA Split (5% per media)		NA	2	
Equipment Blank (5% Sampling Frequency per media)		NA	2	
TOTAL		**NA**	**44**	

Notes:

NA = not applicable.

[a/] Field meter readings include, in soil samples: photoionization detector (PID) readings along entire soil column; and in groundwater: PID headspace, pH, temperature, electrical conductivity, dissolved oxygen (DO), oxidation-reduction potential (ORP), and turbidity.

[b/] QA/QC = quality assurance/quality control; SAP = Sampling and Analysis Plan. The requirement for QA/QC samples may be fulfilled with samples from other parcels.