

State of New Jersey DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF HAZARDOUS WASTE MANAGEMENT

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1 8 APR 1987

Mr. Robert Hargrove, Federal Facilities Coordinator Environmental Impacts Branch United States Environmental Protection Agency Region II - 26 Federal Plaza New York, New York 10278

Dear Mr. Hargrove:

RE: Fort Monmouth, Monmouth County
Updated Phase I Initial Installation Assessment

A review of the updated Phase I - Initial Installation Assessment Report dated November 1986 prepared by Environmental Science and Engineering, Inc. has been made by this office. The Installation Assessment Report (IAR) of May 1980 and this updated Phase I Report assess the potential for hazardous and toxic substances to migrate off the Fort Monmouth Main Post and subposts-Charles Wood Area and Evans Area.

The Phase I Report does not confirm the existence/absence of contamination. The following concerns must be addressed:

- 1) Main Post Area
 - a. The IAR (pg. 39) discusses an asbestos waste landfill behind Building 1220. The asbestos was being stored there pending disposal to a state approved landfill. The disposition of this asbestos landfill has not been addressed.
 - b. The IAR identifies a sixth landfill that is not included in the NJPDES permit. Modification of the NJPDES permit may be required to include additional sampling locations and parameters pending site investigation to confirm the existence of this landfill.
 - c. Previous ground water investigations at the Main Post were limited in scope. To confirm that there are no hazardous pollutants leaving the site due to the disposal of industrial wastes, a round of priority pollutant analysis of the existing monitoring wells, stream sediments and surface water should be performed.

2) Charles Wood Area (CWA)

- a. The updated Phase I Report indicates that the sludge dump was used for storage of treated sludge. The sludge was utilized at the CWA as a soil conditioner/fertilizer for the on-site golf course. Due to the discharging of metal plating waste into the sewer system, the sludge may have been contaminated. Soil and ground water samples should be taken in the area of the sludge dump and analyzed for PP + 40.
- b. The IAR identified an area utilized for the disposal of administrative type waste and wood in the southwest corner of the CWA. The type of waste buried at this site and whether there are any leachate problems from this area should be addressed.
- c. The IAR described the use of on-site underground tanks for the storage of radioactive liquid waste. The disposition of these tanks must be addressed.

3) Evans Area (EA)

- a. The IAR identified two suspected landfill areas. An area west of the sewage treatment plant and an area along the north side of Laurel Gully Brook. The identification of the type of material disposed and the required corrective action, if required, must be addressed.
- b. The IAR described the discharge of plating waste, grease and oil into storm sewers and floor drains. Information on corrective measures taken must be submitted.
- 4) A few aspects of operational and disposal practices at Fort Monmouth may warrant additional or more detailed record and operational practice searches, site inspections, or field investigations. Areas of concern include:
 - a. Soil and ground water contamination of diesel and gasoline fuel leaks from underground and aboveground storage tanks,
 - b. Pesticide, herbicide, rodenticide, and PCB contamination from poor handling practices or spills in the storage areas in Buildings 167 and T-65 (Main Post) and T-2044 (Charles Wood Area).

Please let me know when the meeting with Fort Monmouth personnel will be held. Should you have any questions on the above comments, please contact me at (609) 633-0701.

Sincerely,

Roman S. Luzecky Case Manager

c. Karen Jentis, Chief, BCM
David Barskey, Technical Coordinator, BEERA
David Kaplan, Geologist, GWQCS