The Monmouth County Board of Health

Robert Peters
President

3435 HIGHWAY 9
FREEHOLD, NEW JERSEY 07728-1255

TELEPHONE (732) 431-7456
FAX (732) 409-7579

Michael A. Meddis, M.P.H.
Public Health Coordinator
And
Health Officer

Public Affairs Office -- EA Comments
IMNE-MON-PA, Bldg. 1207, Room G-07
Fort Monmouth, NJ 07703

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To Whom It May Concern:

The Monmouth County Health Department is responding to the *Final Environmental Assessment (EA) of the Implementation of Base Realignment and Closure at Fort Monmouth and the draft Finding of No Significant Impact (FONSI)* (http://www.hqda.army.mil:80/acsim/brac/env_ea_review.htm, March 2009). According to these documents, since the closure of Fort Monmouth will not result in significant adverse environmental effects, the National Environmental Policy Act does not mandate the preparation of an environmental impact statement.

Fort Monmouth currently has 43 installation restoration program sites that were discovered after years of extensive investigation; and have been working with the New Jersey Department of Environmental Protection to successfully close those sites or ensure that remedies continue after property transfer.

These sites include but are not limited to, 9 landfills, over 400 Underground Storage Tanks, aquatic sediments that received discharges from the Fort's 4 former sewer treatment plants, and 22 areas being investigated for impacts from radiation.

The staff of the Directorate of Public Works has demonstrated an exemplary, dedicated work ethic and dedication to the environment during the many detailed briefings and discussions that they have led for the RAB concerning past and ongoing remediation efforts. But some of the final solutions for remedial work are still being determined, and new sources of contamination are still recently being discovered, almost a year and a half before the scheduled property transfer.

On page 3-5, Section 3.2.3 of the EA (http://www.hqda.army.mil/acsim/brac/EA_DOCS/EA_review/Monmouth_EA.pdf) states under "Remedial activities":

Operations at Fort Monmouth over several decades have resulted in localized hazardous waste contamination. As indicated in Section 4.13, several sites at Fort Monmouth could be subject to some level of continuing cleanup activity. In conjunction with remedial activities that might be required during

an interim lease or upon conveyance, the Army would retain a right to conduct investigations and surveys; to have government personnel and contractors conduct field activities; and to construct, operate, maintain, or undertake any other response or remedial action as required.

How does this specifically apply to the following conditions at the Fort, given that the transfer of property is about a year and a half away.

Landfills. The Army is now finalizing planning with the NJDEP to control the ongoing stream bank erosion, including stream bank armoring and the final capping of the 9 landfills. It will take time to see if this method is successful (for example, to see that clearing and capping activities do not exacerbate stream bank erosion by increasing the volume of storm water that discharged into the stream). If this does not control erosion over time, and the debris again begins to protrude from the stream banks, what will be the Army's responsibilities to abate this? What will the Army's responsibilities be to the transferees if the NJDEP later increases the monitoring requirements on these closed landfills after the property is transferred?

Underground Storage Tanks (USTs). There are currently 13 USTs (and 9 Aboveground Storage Tanks) at the Main Post and Charles Woods. Since the early 90's when there were 474 USTs, 358 tanks have been removed from the MP and 103 from CWS. But in the *Conclusions and Recommendations section of the U.S. Army BRAC 2005 Site Investigation Report Fort Monmouth Final 21 July 2008 Final ECP Report – Phase 2* http://www.state.nj.us/fmerpa/library/pdf/hsa/sir14.pdf, results of the most recent geophysical surveys in this 2008 report identified 2 more suspected USTs and 1 suspected septic tank at CWA, and 22 more suspected USTS at the MP. Given that the Army is still determining the locations of new USTs about a year and a half before the scheduled property transfer, in spite of the very large number of USTs that have been removed over the last 2 decades, what specific commitments will Army make to the transferees if new USTs are discovered after the property is transferred in 2011?

Aquatic sediments. There has been limited sampling of the sediment downstream of the 4 Sewage Treatment Plants that were located at the Fort, and this data indicates that no major sediment contamination exists. However, the number of sediment samples for hazardous chemicals that were taken in Parkers Creek, for example, in the area around a former STP, is much fewer than would be required during the mandated grid sampling that would precede dredging Parkers Creek. Dredging the non-navigable areas of Parkers Creek along the Fort would not be funded by the US Army Corps of Engineers; the state of NJ or local government would have to obtain funding. If extensive grid sampling subsequently reveals historic contamination of the sediments in the non-navigable areas of Parkers Creek which require increased costs for disposal of the sediment, would the Army fund this? During an evaluation of this sewer plant in 1971, a thick black sewage sludge layer was found in the sediments near the plant. It is doubtful that this layer, which has since dispersed and may be buried under more recent sediment layers, was sampled for hazardous chemicals, since this event predates the regulatory legislation that was enacted nationally following the Love Canal disaster in New York in 1978.

Regarding the contamination of sediments in Wampum Lake with metals, that was found by the MCHD and by Dr. Dorfman of Monmouth University, it is noted in your report that a privately owned metallurgical company's STP as well as the Fort's STP discharged into Wampum Lake.

Radiation. According to the *Final Historic Site Assessment and Addendum to Environmental Condition of Property Report (January 2007,* http://www.state.nj.us/fmerpa/library/acp_reports.html), approximately 22 buildings, building complexes, and/or open areas have been identified as areas where RAM (radioactive materials) was used, stored, or potentially disposed. Four buildings have been classified as impacted by RAM; potential contaminated media include Class 1, Class 2, or Class 3 building interiors and surfaces, including potentially contaminated work benches, storage cabinets, and disposal sinks. This includes (3) MARSSIM Class 3 impacted sites, at Squier Hall (Bldg. 283: Polonium), the Museum (Bldg. 275: Ra-226) and Museum Storage (Bldg. 292: 'Various'); as well as (1) MARSSIM Class 1 impacted site at the CECOM Laboratory (Bldg. 2540: Cs-137, Pu-238, Tc-99, Co-60, Ra-Be, Cf-252, Th-232, Ra-226, H-3).

Regarding Bldg. 283, the former research laboratories and Signal School training at Squire Hall, the report notes that janitorial closet sinks were original to building and existed during time when wet labs were active and may have residue in drain traps. In addition, the basement contains a sump and water sometimes leaks into area during storm events due to the proximity of a creek. What is the status of the plan for how the sediments, groundwater and sewer lines in the area will be evaluated? The level of decontamination is presumed to be the one described in Section 7.2.1 ("Future Unrestricted Use Criteria Consideration"), which states: "The values shown in Table 7-2 represent radionuclide concentrations that would be deemed in compliance with the 25 mrem/yr (0.25 mSv/yr) unrestricted release dose limit described in 10 CFR 20.1402."

Based on the available information in this 2007 report, the areas listed as "Impacted" need additional surveys and/or samples are necessary for a complete characterization. Data quality objectives and recommendations for specific radiological scoping surveys to support unrestricted release of these impacted areas need to be developed. Is the fort assuming all responsibility to remove radioactive contamination related to fort activities at any time in the future?

Fort Monmouth Hazmat Team. While the impending dissolution of the Fort Monmouth Hazmat Team does not result in a direct environmental impact to the community per se, it will create a significant reduction in the county's capacity, competency, and capability to protect the public from exposure to hazardous materials and CBRNE releases.

There are approximately 120 certified hazmat technicians on the seven hazmat teams currently serving Monmouth County. Fort Monmouth has traditionally maintained at least 35 hazmat technicians on staff, approximately 30% of the total number of hazmat technicians in the County. The loss of almost one third of our hazmat technicians will pose several problems for the County's hazmat and CBRNE emergency response program. Response times to routine hazmat incidents involving those municipalities currently served by Fort Monmouth will dramatically increase after their dissolution. The MCHD hazmat team is based in Freehold and would need at least 30-45 minutes to provide a full response to the Fort Monmouth area. Response to after hours calls would take even longer, since MCHD team members respond from home and may have to pick up specialized equipment and supplies from the Freehold warehouse before proceeding to the scene. Other volunteer teams may be able to provide faster response times to the Fort Monmouth area than the county. Nevertheless, as volunteer organizations, they may not be able to provide full response capability on a consistent 24/7/364 basis.

Large-scale hazmat and CBRNE incident response will also be affected by the departure of Fort Monmouth.

Thank you for the opportunity to comment.

Sincerely,

Robert Peters

Robert Peters
President, Monmouth County Board of Health