



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 Comments to NJDEP Comments on Final Remedial Investigation Report for FTMM-25 dated August 2016 (and Landfill Boundary Refinement for FTMM-25 only dated January 2016)"

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: Date: 29 November, 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

November 29, 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: *Final Remedial Investigation Report for FTMM-25 dated August 2016 (& Landfill Boundary Refinement for FTMM-25 only dated January 2016)*
Fort Monmouth, Oceanport, New Jersey
PIG000000032

Dear Ms. Range:

The Fort Monmouth (FTMM) team has reviewed the New Jersey Department of Environmental Protection (NJDEP) comments (letter dated October 12, 2016) on the subject submittals. Responses to the comments are provided below in the order in which they were presented in the comment letter.

A. Soil Analytical Results

A. COMMENT: *Elevated levels of PAHs and priority pollutant metals have been noted, however, contaminants of concern are to be addressed via engineering and institutional controls. Addressing all known levels of contamination in this manner is acceptable pending compliance with comments as noted below. If areas of obvious and/or significant contamination are encountered during the landfill preparation or capping activities, it is possible hot spot removal may be necessary.*

As has been previously discussed, all historically noted sample locations containing elevated levels of contamination are to be addressed via engineering and institutional controls (none may remain beyond the area undergoing capping). Figure 2-1 of the submittal displays historic boring locations relative to the 2015 revised boundary. A review of analytical data appears to confirm locations with elevated concentrations are located within the 2015 revised boundary.

A. RESPONSE: The proposed remedy as described in the August 2016 FTMM-25 Remedial Investigation Report (RIR) remains the same, and contaminants of concern will be addressed via the NJDEP Site Remediation Program (SRP) policy that allows for contaminants

with appropriate institutional and engineering controls to be non-permanently remediated as long as the remedy is found to be protective of human health and the environment.

Institutional controls (i.e. deed notice) will be implemented at FTMM-25 as soil concentrations are above their respective NJDEP residential direct contact soil remediation standards (RDCSRS). Engineering controls (i.e. a cap) will also be implemented at FTMM-25 to address safety concerns and to protect non-residents from future exposure to solid waste at the landfill. A secondary benefit of the cap will be to prevent future exposure of soil concentrations above their respective NJDEP non-residential direct contact soil remediation standards (NRDCSRS). The applicable controls will be applied based on the level of contamination.

B. Landfill Boundary

B. COMMENT: *This office does not agree with Figure 11 regarding the designation of test pit M25TP9. Although it is designated green (no landfill material) on the figure, the log indicates intermittent pieces of concrete and brick were encountered in the 0-3.5' interval; the test pit should therefore be designated red. It does not impact the boundary, however, as the test pit is located within the designated landfill boundary.*

Based upon reviews of the historic aerials, historic sampling locations and analytical findings, as well as test pit and boring locations and findings, the boundary as noted in Figure 11 of the January 2016 Landfill Boundary Refinement and Methane Gas Survey Report for Nine Landfills appears to adequately encompass the extent of the FTMM-25 landfill as well as the areas of contamination noted during soil sampling events.

B. RESPONSE: Although FTMM disagrees with the NJDEP on the test pit categorization of M25TP9, the test pit designation will be changed from green to red on Figure 11. FTMM concurs with the NJDEP's agreement on the landfill boundary for FTMM-25, and that the contents of M25TP9 do not impact the landfill boundary

C. Debris Found Beyond the Landfill

C. COMMENT: *There is an area noted approximately 80'-100' north of the landfill, on Figures 2.1 (RIR) and 11 (LF Boundary) at which a review of the test pit logs indicate the presence of surficial or near surface material - Test Pit 8 (ash, brick 0-6"), Test Pit 8A (coal, ash, brick from 2-6"), Test Pit 8B (coal, concrete and ash 1-1.5') and Test Pit 15 (ash, coal 4-6"). The historic aerials appear to indicate this material is present in the area of a former roadway located between the landfill and an agricultural field. Although it is agreed these test pits are not located within the boundaries of the FTMM-25 landfill, as evidenced by review of the aerials, they do represent material which was apparently "dumped" in this area, and which must be addressed in an acceptable manner.*

Finally, as per the Management Approach for the Debris Areas near the FTMM-25 Landfill, the exposed debris piles of varying sizes located several hundred feet northeast of the

FTMM-25 landfill (most of which are noted in Figure 2.1 A), while not considered part of the FTMM-25 landfill, are to be addressed via over-excavation (a minimum of one foot of underlying soil will be removed with the debris at each location). Field screening and visual observations will be performed during the debris removal for evidence of hazardous substances. The debris will be incorporated into the FTMM-25 landfill prior to capping activities. If the former/current presence of a hazardous material is indicated, sampling for TCL+TICs/TAL and EPH is to be performed.

C. RESPONSE: In the area north of the FTMM-25 landfill, FTMM will excavate the material contained in Test Pit 8, 8A, 8B, and 15 and relocate it within the existing FTMM-25 landfill boundaries. Due to the limited extent of the material present in these test pits, excavation of the material and relocation to within the landfill boundary is proposed to include this material under the proposed engineering control landfill cover. FTMM concurs that the FTMM-25 landfill boundary will not be revised.

FTMM will address the exposed debris piles to the northeast of the landfill as described in the comment above and in accordance with the June 21, 2016 letter *Management Approach for the Debris Areas near the FTMM-25 Landfill* in which NJDEP accepted the proposed removal approach.

D. Proposed Remedy

D. COMMENT: *The landfill is to be cleared, regraded, and covered with a vegetated (or functional equivalent) two foot cap of clean soil. A vegetated soil cover of two feet of clean fill, the implementation of a LUC through filing of a deed notice with its incumbent inspection and reporting requirements, was previously deemed appropriate and is acceptable. Although conceptually feasible, a "functional equivalent" in lieu of the vegetated layer must be proposed and reviewed for appropriateness once specifications are known, to ensure "functional equivalency".*

D. RESPONSE: FTMM agrees with NJDEP summary of the proposed remedy. The FTMM team is currently working with the Fort Monmouth Economic Redevelopment Authority (FMERA) to identify landfills where a functional *equivalent* (e.g., expanded parking lot) maybe installed rather than the vegetated soil cover. Information on the proposed landfill cover design including those landfills where a functional equivalent cover maybe installed will be presented in the *Draft Conceptual Design Report for Nine Landfills*. It is anticipated that this report will be submitted to the NJDEP after approval of comments on the nine RIR FTMM landfill reports, and the *Landfill Boundary Refinement and Methane Gas Survey Report for Nine Landfills*.

E. Miscellaneous

E. COMMENT: *As previously discussed with the Anny, the Department did not approve the site-wide background soil or ground water quality investigations referenced in*

the submittal, e.g. the Weston 1995 Background Investigation or 2011 Brinkerhoff Background Metals Evaluation.

E. RESPONSE: FTMM acknowledges that the site-wide background soil and ground water quality investigations referenced in the submittal have not been approved by NJDEP.

We look forward to your review of these responses and approval of the FTMM-25 RIR and the FTMM-25 portion of the *Landfill Boundary Refinement and Methane Gas Survey Report for Nine Landfills*. 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, PG, CHMM
BRAC Environmental Coordinator

cc: Linda Range, NJDEP (e-mail and 3 hard copies)
Delight Balducci, HQDA ACSIM (e-mail)
Joseph Pearson, Calibre (e-mail)
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