



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-14 dated July 2015 (and Landfill Boundary Refinement for FTMM-14 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: 23 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 23, 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-14 dated July 2015 (& Landfill Boundary Refinement for FTMM-14 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 July 11, 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, priority pollutant metals and pesticides (DDT) 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 additional 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; a review of analytical data appears to confirm all locations with elevated concentrations are located within the 2015 revised boundary (this should have been reflected on a map).

A. RESPONSE: The proposed remedy as described in the July 2015 FTMM-14 Remedial Investigation Report (RIR) remains the same, and contaminants of concern will be addressed via the NJDEP Site Remediation Program (SRP) policy since 1993 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. Please note that the RIRs for the FTMM Landfills have been submitted to the NJDEP at the time of this letter, as such revised figures will not be submitted for the landfill RIRs. Updates to Figure 2-1 will be included in the Remedial Action Work Plan for the nine FTMM landfills.

B. Landfill Boundary

B. COMMENT: *The boundaries of the landfill were further refined beyond that indicated on Figure 2-1 of the RIR. 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 G1 of the January 2016 Landfill Boundary Refinement and Methane Gas Survey Report for Nine Landfills submittal appears to adequately encompass the extent of known contamination and landfilled material at FTMM-14, with the possible exception of test pit M14TP17 along the noted northern boundary. The field log for M14TP17 indicates the presence of some concrete and asphalt from 0-4', which could be indicative of landfill material. As such, the boundary should be moved north in this area, or the material pulled into the area deemed "landfill", unless information is submitted which sufficiently documents why this material should not be considered same.*

B. RESPONSE: FTMM disagrees with NJDEP on their assessment of test pit M14TP17, and maintains that debris of a scattered nature and or *de minimus* quantity does not constitute a landfill. The solid waste regulations (N.J.A.C. 7:26-1.4) define a landfill as a solid waste facility or sanitary landfill, at which solid waste is deposited on or into the land as fill for the purpose of permanent disposal or storage for a period of time exceeding six months. As the contents of the test pits demonstrate, FTMM-14 contains primarily construction and demolition debris and do not constitute a typical landfill. It is generally recognized that scattered debris may exist outside the limits of a consolidated landfill, as such we made a judgment for FTMM-14 on a case-by-case basis that some debris (of a scattered nature and *de minimus*) in selected test pits did not constitute a landfill, which we believe is reasonable and appropriate given the wide variety of activities at FTMM over many decades. Although FTMM disagrees with the NJDEP regarding the landfill boundary, FTMM will either excavate the material (debris of a scattered nature and or *de minimus* quantity) contained in M14TP7 and relocate it within the landfill boundaries or extend the proposed cap to include this material under the proposed soil cover engineering control design. The landfill boundary will not be revised in this area; however, the proposed engineering control (cap) may be extended beyond the landfill boundary to cover scattered and *de minimus* material.

In addition, FTMM would like to reiterate that the landfill boundaries are based on the presence of landfill waste, and not based on the presence of contamination. The presence of landfill material and soil contamination are two separate issues; contamination alone does not define landfill boundaries. However; there may be synergies when it comes to a remedy (i.e., a cap), as both landfill material and soil concentrations above the NJDEP Residential Direct Contact Soil Remediation Standards (NRDCSRS) require an engineering control (e.g., cap), whereas soil above a RCDSRS requires only an institutional control (deed notice).

C. Proposed Remedy

C. COMMENT: *The landfill is to be cleared, regraded, and covered with a vegetated two foot cap of clean soil. A vegetated soil cover of two feet of clean fill, and 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.*

C. RESPONSE: FTMM concurs with the proposed remedy stated by NJDEP for FTMM-14 in Comment C.

D. Miscellaneous

D. COMMENT: *The Department agreed in July of 2014 with the recommendation to discontinue the long term ground water monitoring at FTMM-14.*

As previously discussed with the Army, although AOC or parcel specific investigations have confirmed the presence of naturally occurring levels of metals at specific areas of the site, 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.

D. RESPONSE: FTMM acknowledges that NJDEP agreed to discontinue the LTM program at FTMM-14 and indicated in the same July 2014 letter that the monitoring wells shall be properly abandoned if they are no longer subject to sampling or gauging for water elevations. In addition, 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-14 RIR. 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

Linda S. Range, NJDEP
Response to Comments
Final RIR for FTMM-14
November 23, 2016
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cc: Linda Range, NJDEP (e-mail and 3 hard copies)
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