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-03 dated February 2016 (and Landfill Boundary Refinement for FTMM-03 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: William R Colvin Date: 18 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 18, 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-03*** **dated February 2016 (&** ***Landfill Boundary Refinement for FTMM-03*** **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 June 22, 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. <u>Soil Analytical Results</u>

A. COMMENT: *Elevated levels of VOCs, pesticides, priority pollutant metals, PAHs, and PCBs have been noted in the soil. Levels of PCBs have been found which are to undergo additional confirmatory delineation efforts, see below, however, contaminants of concern are to be addressed via engineering and institutional controls. Addressing all known remaining 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 discussed, all previously 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 all historic boring locations, and appears to confirm all are located within the noted FTMM-03 Landfill 2015 revised boundary.

A. RESPONSE: PCBs remedial actions for FTMM-03are provided in the subsequent responses below. The proposed remedy as described in the February 2016 FTMM-03 Remedial Investigation Report (RIR) remains the same, and contaminants of concern other than PCBs 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 those locations with soil concentrations above their respective NJDEP Residential Direct Contact Soil Remediation Standards (NRDCSRS), and engineering controls (i.e., a cap) will also be implemented at those locations with soil concentrations above their respective NJDEP Non-Residential Direct Contact Soil Remediation Standards (RDCSRS). The applicable controls will be applied based on the level of contamination.

Select historical borings exhibited soil chemical concentrations greater than their respective NRDCSRS and RDCSRS, and these soil boring locations will be addressed by the institutional and engineering controls previously described. Due to the locations of these historical soil borings being within the proposed landfill boundaries, there are no proposed changes to the landfill boundaries at FTMM-03.

B. PCBs

B. COMMENT: *PCBs have been noted at several sample locations, centered near boring B-92, each below 25 mg/kg. A pre-design investigation (PDI) will be conducted to further delineate the extent of PCBs in soil to verify the concentrations do not exceed 25 mg/kg at the landfill, as appropriate. Any PCB soils found to be impacted above 25 mg/kg will require removal.*

B. RESPONSE: FTMM acknowledges that PCBs at FTMM-03 are present at concentrations at several locations less than 25 mg/kg. FTMM-03 was previously identified as requiring additional PCB delineation in its RIR report. However, based on various conversations held with NJDEP in September 2016 and as described in the September 29, 2016 *FTMM-02, FTMM-03 and FTMM-08 PCB Pre-Design Investigation Field Work for PCB Delineation* letter to NJDEP, the NJDEP and the Army are in agreement that additional delineation is not required at this landfill. PCBs in soil will be addressed by the deed notice and the proposed engineered cap to be placed over the FTMM-03 landfill.

C. Landfill Boundary

C. COMMENT: *This office does not agree in entirety with the boundaries as shown on Figure B1, Appendix B of the January 2016 Landfill Boundary Refinement and Methane Gas Survey Report for Nine Landfills, based upon findings in the test pit field logs (e.g. M3TP12 noted bricks and concrete from 2-4', while ash, concrete and rested metal was found at 1.5-4' at M3TP19). However, the FTMM-03 Landfill Revised Boundary (2015) as indicated in Figure 2.1 of the RI does appear acceptable based upon known information.*

C. RESPONSE: The FTMM team's detailed evaluation of the landfill boundary did not presume that all debris was outside the landfill boundary. 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. It is generally recognized that scattered debris may exist outside the limits of a consolidated landfill. As the contents of the test pits demonstrate, FTMM-03 contains primarily construction and demolition debris and does not constitute a typical landfill. We did, however, use site knowledge and evidence from extensive test pit operations to make a professional judgment at FTMM-03 on a case-by-case basis that some debris (of a scattered nature and *de minimus*) in select test pits was not contiguous and did not constitute a landfill. The FTMM team believes this is reasonable and appropriate given the wide variety of activities at FTMM over many decades.

Although FTMM disagrees with the NJDEP on some of the test pit categorization, FTMM will either excavate the material (debris of a scattered nature and or *de minimus* quantity) contained in M3TP12 and M3TP19 to locate it within the existing landfill boundaries, or extend the proposed cap to include this material under the proposed engineering control landfill cover. 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 the debris of a scattered and *de minimus* material.

D. <u>Proposed Remedy</u>

D. COMMENT: *Following confirmation no PCBs above 25 mg/kg are present, 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, possibly FTMM-03, 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 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, the Department has not approved the previously performed background soil and ground water quality investigations, i.e. the Weston 1995 Background Investigation and the Brinkerhoff Background Metals Evaluation which are referenced in the submittal.*

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-03 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

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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