



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

May 10, 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: State of New Jersey Department of Environmental Protection Comments on the October 2015 Final Groundwater Sampling Report – Third Quarter 2014 FTMM-22, FTMM-53 and FTMM-68 Fort Monmouth, Oceanport, Monmouth County.
PI # G000000032
Activity Number: RPC000001

Dear Ms. Range:

Fort Monmouth (FTMM) and Parsons have reviewed the New Jersey Department of Environmental Protection (NJDEP) comments on the Final Groundwater Sampling Report – Third Quarter 2014 FTMM-22, FTMM-53 and FTMM-68 as documented in your letter dated December 14, 2015. Responses to your comments are provided below in the order in which they were presented in the comment letter.

A. FTMM-22

A. COMMENT: The addition of wells CW1MW28 and CW1MW37 to the quarterly monitoring program for the FTMM-22 site is appropriate.

A. RESPONSE: Currently the remedial investigation (RI) report for FTMM-22 is in the process of being completed by the Army and subsequently will be submitted to the NJDEP for review. In the meantime, FTMM will temporarily suspend the long-term monitoring program (LTMP) for groundwater at FTMM-22 beginning in the first quarter of 2016. The reason is because the collective RI data for FTMM-22 already provides a good characterization of the concentrations of constituents in groundwater and allows for the evaluation of the groundwater data as a whole. Since the RI process is ongoing, there is minimal benefit to continuing the LTMP while characterization of the site is being completed. Once the RI is complete and accepted by the NJDEP, a revised LTMP for the groundwater will be submitted for FTMM-22. This approach was approved in a letter from the NJDEP dated March 16, 2016.

B. FTMM-53

B. COMMENT: Previously ground water sampling reports indicated ground water flow direction at FTMM-53 is to the south. This current report indicates ground water flows to the east across the site. Confirmation of true flow direction is required for the next progress report. If flow

direction is to the east, then additional wells/well points are required east of well 699MW06 to complete horizontal and vertical ground water delineation of contaminants.

B. RESPONSE: Currently FTMM-53 is in the process of completing the RI phase since the field work was recently finished in December 2015. During this phase FTMM will review historical groundwater flow directions and include them in the report. Based on the collected data to date, there is a consistent eastward flow direction on the eastern portion of the site, and a southeastern flow on the west-northwestern portion of the site. Slight variations in the direction of shallow groundwater flow are common at this site (as well as at most sites in New Jersey) and can result from seasonal changes in the water table. To evaluate flow and groundwater chemistry to the east, the additional wells installed for the RI at adjacent FTMM-68 site will be used to complete the RI at FTMM-53.

In addition, FTMM will temporarily suspend the LTMP for groundwater at FTMM-53 beginning in the first quarter of 2016. The collective RI data for FTMM-53 provides a good characterization of the concentrations of constituents in groundwater and allows for the evaluation of the groundwater data as a whole. Since the RI process is ongoing there is minimal benefit to continue the LTMP while characterization of the site is being completed. Once the RI is complete and accepted by the NJDEP, a revised LTMP for the groundwater will be submitted for FTMM-53. This approach was approved in a letter from the NJDEP dated March 16, 2016.

C. FTMM-68

C1. COMMENT: Future sampling reports for the FTMM-68 site must include groundwater contour maps constructed from ground water-elevation data obtained from wells within and in the vicinity of the site.

C1. RESPONSE: FTMM-68 is currently in the RI phase with the initial field work investigation recently completed in December 2015. At the time of the data collection for the Third Quarter 2014 report the only two existing onsite wells (565MW01 and 565MW01D) had not been surveyed. The two existing wells were surveyed December 2015 and the new survey data along with additional groundwater elevation points and groundwater contour maps will be incorporated into the Annual (Fourth Quarter) 2015 Report. In addition, wells installed at nearby FTMM-53 and wells installed to the east will be used to evaluate groundwater flow directions and chemistry, including VOCs, at FTMM-68 as part of the RI process.

C2. COMMENT: The BGWPA previously provided comments regarding the use of PDBS at the FTMM-68 site. The BGWPA stated that PDBS for long-term monitoring would be acceptable if low-flow sampling is conducted concurrently once or twice for comparison. Low-flow sampling has not been conducted at this site. Future sampling must include low-flow sampling conducted concurrently with PDBS for a minimum of one or 2 quarters.

C2. RESPONSE: Comparison of low-flow purge and sampling (LFPS) and Passive Diffusion Bags (PDB) sampling at FTMM-68 has not been conducted since the NJDEP agreed in their February 5, 2015 letter to postpone this sampling until the site was fully characterized. The initial field work investigation at FTMM-68 was completed in December 2015. Sampling of existing and newly installed wells was performed using the LFPS method. VOC analyses were included for groundwater characterization. The RI data are being reviewed and in the meantime FTMM will temporarily

Linda S. Range, NJDEP

Response to Comments

Final Groundwater Sampling Report – Third Quarter 2014 FTMM-22, FTMM-53 and FTMM-68

May 10, 2016

Page 3 of 3

suspend the LTMP for FTMM-68, approved in a letter from the NJDEP dated March 16, 2016. The collective RI data provides a good characterization of the concentrations of constituents in groundwater at the site and since the RI is ongoing there is minimal benefit to continue the LTMP while characterization of the site is being completed. Once the RI is complete and accepted by the NJDEP, a revised LTMP will be submitted that will include conducting LFPS and PDB sampling concurrently for one quarter.

C3. COMMENT: The chlorinated VOC contamination beneath the FTMM-68 site must be horizontally and vertically delineated.

C3. RESPONSE: Agreed, see Response to Comments C1 and C2.

Should you have any questions or require additional information, please contact me at (732) 380-7064 or by email at william.r.colvin18.civ@mail.mil.

Sincerely,



William R. Colvin, PMP, CHMM, PG
BRAC Environmental Coordinator
OACSIM – U.S. Army Fort Monmouth

cc: Linda Range, NJDEP (e-mail and 3 hard copies)
Delight Balducci, HQDA ACSIM (e-mail)
Joseph Pearson, Calibre (e-mail)
James Moore, USACE (e-mail)
Jim Kelly, USACE (e-mail)
Cris Grill, Parsons (e-mail)



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 Groundwater Report - Third Quarter 2014 FTMM-22, FTMM-53 and FTMM-68"

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: 5/10/2016

Name/Title: William R. Colvin / BRAC Environmental Coordinator