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-05 dated October 2015 (and Landfill Boundary Refinement for FTMM-05 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: William R Colvin 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-05*** **dated October 2015** ***(& Landfill Boundary Refinement for FTMM-05 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 (dated August 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 PAHs, pesticides, priority pollutant metals, VOCs (PCE at 5 ppm), and a single exceedance of PCBs (at 1.499 ppm) 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).

A. RESPONSE: The proposed remedy as described in the October 2015 FTMM-05 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-05 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-05 to address safety concerns and to protect non-residents from future expose 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: *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 Dl of the January 2016 Landfill Boundary Refinement and Methane Gas Survey Report for Nine Landfills appears to adequately encompass the extent of known contamination and landfilled material at FTMM-5, with the following exception.*

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, with the possible exception of contamination associated with location B-254. As both pesticide and PAH exceedances are present at this location, it appears the 2015 boundary as indicated on Figure 2.1 may be too close to the boring location to ensure contamination is contained within the boundary. It is therefore recommended the boundary be moved slightly south of location B-254.

B. RESPONSE: B-254 is located within the FTMM-05 boundaries and 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. Based on benzo(a)pyrene and 4,4-DDT contaminant concentrations in B-254 exceeding their respective RDCSRS and NRDCSRS, the FTMM-05 engineered soil cap will either be extended to ensure that this location is included as part of the soil cover engineering control design or the soil associated with this boring location will be over excavated to the native material and the excavated soil relocated within the landfill boundaries. The landfill boundary in this area will not be revised; however, the proposed engineering control (cap) may be extended beyond the landfill boundary to cover the debris of a scattered and *de minimus* material

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 the filing of a deed notice with its incumbent inspection and reporting requirements, was previously deemed appropriate and is acceptable.*

It is anticipated a CEA will be established, to remain in place until NJDEP Ground Water Quality Standards are achieved at FTMM-5. The use of the term "residential" user, within the

submittal's discussion as to the intent of a CEA, however, is not accurate. CEAs are established in order to provide notice that the constituent standards for a given aquifer classification are not or will not be met in a localized area due to natural water quality or anthropogenic influences, and that designated aquifer uses are suspended in the affected area for the term of the CEA. The Department shall restrict or require the restriction of potable ground water uses within any Classification Exception Area where there is or will be an exceedance of the Primary Drinking Water Quality Standards. The intent of such Departmental action is to ensure that the uses of the aquifer are restricted until standards are achieved

C. RESPONSE: FTMM concurs with the proposed remedy a of a vegetated soil cap for FTMM-05 as stated by NJDEP in comment C. The Army agrees with the NJDEP clarification of and the intent of a CEA. As discussed on our November 15, 2016 conference call, the selected remedy for groundwater is monitored natural attenuation (MNA) since groundwater concentrations at FTMM-05 are above the NJDEP Groundwater Quality Standards (GWQS) and Institutional Controls in the form of a CEA will be implemented and remain in place until NJDEP GWQS are achieved at the site.

D. <u>Miscellaneous</u>

D. COMMENT: *As previously discussed with the Army, 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 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-05 RIR and the FTMM-05 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)
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