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BOB MARTIN
Commissioner

July 3, 2014

Wanda Green
BRAC Environmental Coordinator
OACSIM – U.S. Army Fort Monmouth
PO Box 148
Oceanport, NJ 07757

Re: Final Baseline Groundwater Sampling Report (August 2013)
Remedial Investigation/Feasibility Study/Decision Documents
Fort Monmouth
Oceanport, Monmouth County
PI G000000032

Dear Ms. Green:

The New Jersey Department of Environmental Protection (Department) has completed review of the referenced report, dated March 2014, received on April 7, 2014. The report was prepared by Parsons Government Services Inc. (Parsons), in support of the Remedial Investigation (RI), Feasibility Study (FS), and Decision Documents project at Fort Monmouth.

A baseline ground water sampling event was conducted at 21 "sites" at the Fort Monmouth property in August 2013. The purpose of the sampling event was to re-establish baseline conditions following suspension of ground water sampling in late 2011, as well as to evaluate Fort Monmouth's long-term ground water sampling program, and the current analytical conditions of the ground water at each site. Sampling methodologies used included low-flow and passive diffusion bag samplers (PDBS). At four sites (FTMM-14, 18, 59, 68), only PDBS sampling was conducted. At three sites (FTMM-05, 22, 58) both low-flow and PDBS samples were obtained for comparison purposes. Fourteen (14) sites were only sampled using low-flow. The report states that PDBS concentrations were consistently biased somewhat low compared to the low-flow concentrations. The report concludes, however, that the PDBS results were still similar to the low-flow results and are considered representative of ground water conditions at the sites. Based on this conclusion, the report states that for future ground water sampling, PDBS will be used for all sites where volatile organic compounds (VOCs) are the sole contaminants of concern. Comments are presented below.

Section 3.1; Table 6; Appendices & associated Tables - *The "background concentrations" submitted in the 1995 Weston report were not accepted by the Department as representative of background conditions for Fort Monmouth. The study was not performed in accordance with Departmental protocol and is not a consideration in our evaluations/determinations. As indicated in Section 3.1, background concentrations are evaluated on a site by site basis.*

FTMM-02 Landfill

Historic sampling at this parcel indicated levels of VOCs above the Ground Water Quality Standard (GWQS); metals were previously determined to be reflective of naturally occurring conditions. The August 2013 sampling of wells using low-flow confirmed the continued exceedance of the GWQS for VOCs. The report recommends VOC sampling of wells M2MW03, M2MW11, M2MW21, M2MW22 and M2MW24 for two additional rounds using PDBS. Well M2MW10 will be monitored as a downgradient sentinel well. Although the proposal is acceptable, for wells in which the saturated screen length exceeds 10 feet, the deployment of multiple PDBS will be required. At any point where a decision is made to terminate ground water sampling at this site, confirmatory sampling using low-flow due to PDBS biasing low as compared to low-flow results at the Fort Monmouth site will be required.

FTMM-03 Landfill

Historic sampling at this parcel revealed GWQS exceedances of vinyl chloride and metals. The August 2013 sampling of wells using low-flow confirmed the continued exceedance of the GWQS for vinyl chloride in well 3MW07. Well 3MW02 was not sampled due to low water column and silty conditions, however, Table 4 of Appendix B recommends sampling of 3MW02 for VOCs and metals. The report attributes the presence of vinyl chloride to leaching of PVC piping from well 3MW07. A temporary well point investigation was conducted in 2009 to delineate the vinyl chloride, the results were non-detect, and abandonment of 3MW07 is recommended. The recommendations are acceptable. However, a figure presenting the locations and sampling results from the 2009 temporary well point investigation must be provided to the Department.

FTMM-04 Landfill

Historic sampling at this parcel revealed GWQS exceedances of various metals. The August 2013 sampling of wells using low-flow confirmed the continued exceedance of the GWQS for metals. The metals are attributed to background conditions, and cessation of ground water sampling is recommended. The recommendation is acceptable. Monitoring wells at this parcel shall be properly abandoned if they are no longer subject to sampling or gaging for water elevation data.

FTMM-05 Landfill

Historic sampling at this parcel revealed GWQS exceedances of PCE, TCE and vinyl chloride, which the August 2013 sampling, using low-flow and PDBS, confirmed. The report recommends annual VOC sampling of wells M5MW11, M5MW16, M5MW20 and M5MW23 using PDBS. The Department finds the proposal to be acceptable. At any point where a decision is made to terminate ground water sampling at this parcel, the Department will require confirmatory sampling using low-flow due to PDBS results at this parcel biased low compared to the low-flow results.

FTMM-08 Landfill

Historic sampling at this parcel revealed GWQS exceedances of pesticides, benzene, PCE and lead. The August 2013 sampling of wells using low-flow confirmed the exceedance of the GWQS for PCE and lead. The well with historic pesticide exceedances (697MW01) could not be located and was not sampled. The report recommends annual ground water sampling of well M8MW11 for VOCs and lead, M8MW12, 15, 16 and 24 for VOCs and M8MW17 and 21 for lead only. Monitoring well 697MW01 will be located and sampled for pesticides, lead and VOCs. The recommendation is acceptable.

FTMM-12 Landfill

Historic sampling at this parcel revealed GWQS exceedances of various metals, including arsenic and lead. Historic exceedances of metals except for lead are attributed to background quality. The August 2013 sampling was conducted for lead analysis only. Lead was not detected. The report recommends discontinuing ground water sampling at this parcel. The Department finds the recommendation to be acceptable. Monitoring wells at this parcel shall be properly abandoned if they are no longer subject to sampling or gaging for water elevation data.

FTMM-14 Landfill

Historic sampling at this parcel revealed no GWQS exceedances of VOCs. The August 2013 sampling of wells using PDBS confirmed that there was no exceedance of the GWQS. The report recommends discontinuing ground water sampling at this parcel. The Department finds the recommendation to be acceptable. Monitoring wells at this parcel shall be properly abandoned if they are no longer subject to sampling or gaging for water elevation data. The Department also notes that on Table 1, well M14MW19 is listed as having 10 feet of total screen length. However, the table also lists the saturated screen length as 13.35 feet. This discrepancy should be clarified.

FTMM-18 Landfill

Historic sampling at this parcel revealed GWQS exceedances of benzene and 1,2-DCA. The August 2013 sampling results of wells using PDBS showed the exceedance of the GWQS for 1,2-DCA in well M18MW22. Well M18MW23 could not be located and was not sampled. The report recommends annual ground water sampling using PDBS for M18MW22 and M18MW23 if it can be located. Every reasonable effort, such as reviewing the NJ State Plane Coordinates of the well, must be made to locate M18MW23. The use of M18MW22 as the sole monitoring well at this parcel will not be acceptable due to the vast difference in historical concentrations between M18MW22 and M18MW23. Historic 2011 benzene concentrations for M18MW23 were 775 ppb and 664 ppb while 2011 concentrations for M18MW22 were 1.81 ppb and 1.65 ppb. The Department cannot approve the use of PDBS sampling only for this parcel. Once M18MW23 is located, the Department can approve the use of both PDBS and low-flow sampling for comparison purposes.

FTMM-22 Former Wastewater Treatment Lime Pit

Historic sampling at this parcel revealed GWQS exceedances of TCE. The August 2013 sampling of wells using low-flow and PDBS confirmed the continued exceedance of the GWQS for TCE in ground water. The report recommends quarterly VOC sampling of wells CW1MW27, CW1MW29, CW1MW31 and CW1MW281 using PDBS. The Department finds the proposal to be acceptable. At any point where a decision is made to terminate ground water sampling at this parcel, the Department will require confirmatory sampling using low-flow due to PDBS results biasing low compared to low-flow results at the Fort Monmouth site.

FTMM-25 Landfill

Historic sampling at this parcel revealed GWQS exceedances of various metals. The August 2013 sampling of wells using low-flow confirmed the continued exceedance of the GWQS for metals. The metals are attributed to background conditions. The report recommends discontinuing ground water sampling at this parcel. The Department finds the recommendation to be acceptable. Monitoring wells at this parcel shall be properly abandoned if they are no longer subject to sampling or gaging for water elevation data.

FTMM-53 Building 699

Historic sampling at this parcel revealed GWQS exceedances of benzene, PCE, TCE, TBA, VOC TICs and lead. The August 2013 sampling of wells using low-flow showed the exceedance of the GWQS for benzene, xylenes, PCE, 1,2,4-Trimethylbenzene, 1,3,5-Trimethylbenzene and VOC TICs. The report recommends quarterly VOC sampling of wells 699MW01, 699MW04, 699MW06, 699MW09, 699MW16, 699RW03, 699RW05 and 699RW11 using PDBS. The Department finds the proposal to be acceptable. For wells in which the saturated screen length exceeds 10 feet, the deployment of multiple PDBS will be required. At any point where a

decision is made to terminate ground water sampling at this parcel, the Department will require confirmatory sampling using low-flow due to PDBS biasing low compared to low-flow at the Fort Monmouth site.

FTMM-54 Building 296

Historic sampling at this parcel revealed GWQS exceedances of benzene, lead and arsenic. The metals are attributed to background conditions. The August 2013 sampling of wells using low-flow showed an exceedance of the GWQS for benzene. The report recommends annual VOC sampling of wells 269MW04 and 296MW06 using PDBS. The Department finds the proposal to be acceptable. For wells in which the saturated screen length exceeds 10 feet, the deployment of multiple PDBS will be required. At any point where a decision is made to terminate ground water sampling at this parcel, the Department will require confirmatory sampling using low-flow due to PDBS biasing low compared to low-flow at the Fort Monmouth site.

FTMM-55 Building 290

Historic sampling at this parcel revealed GWQS exceedances of arsenic and lead. The August 2013 sampling of wells using low-flow confirmed the continued exceedance of the GWQS for lead. The metals are attributed to background conditions. The report recommends discontinuing ground water sampling at this parcel. The Department finds the recommendation to be acceptable. Monitoring wells at this parcel shall be properly abandoned if they are no longer subject to sampling or gaging for water elevation data.

FTMM-56 Building 80

Historic sampling at this parcel revealed GWQS exceedances of chlordane, arsenic, lead and cadmium. The August 2013 sampling of wells was conducted for lead only using low-flow. There were no exceedances of lead. The report recommends one additional sampling round of well 80MW02 for chlordane and 80MW05 for lead. The Department finds the recommendation for well 80MW02 to be acceptable. The Department disagrees with the recommendation to sample well 80MW05 for lead only. The last low-flow sampling event in August 2011 had lead, arsenic and cadmium exceeding both the GWQS and background concentrations. Well 80MW05 shall be sampled during the next round for TAL metals.

FTMM-57 Building 108

Historic sampling at this parcel revealed GWQS exceedances of lead. In the August 2013 sampling event, there were no exceedances of lead in ground water. The report recommends two additional sampling rounds of well 108MW04 for lead. The Department finds the recommendation acceptable.

FTMM-58 Building 2567

Historic sampling at this parcel revealed GWQS exceedances of TBA in wells 2567MW01 and 2567MW03. The August 2013 sampling results using low-flow and PDBS were below the GWQS for TBA. The report recommends two annual sampling events for TBA analyses of wells 2567MW01 and 2567MW03 using low-flow. The Department finds the proposal to be acceptable.

FTMM-59 Building 1122

Historic sampling at this parcel revealed no GWQS exceedances for VOCs. The August 2013 sampling results of wells using PDBS showed no exceedance of VOCs. The text of the report recommends VOC sampling of well 1122MW07 for one additional sampling round to confirm the 2013 results because August 2013 was the first time this well was sampled. The Department finds the proposal to be acceptable. The Department also notes that there is a discrepancy between the recommendation in the text and the recommendation in Table 7. Table 7 recommends that sampling at this parcel be discontinued. Table 7 shall be amended to indicate well 1122MW07 will be sampled for VOCs using PDBS methodology.

FTMM-61 Building 283

Historic sampling at this parcel revealed GWQS exceedances of metals, benzene and VOC TICs in 283MW02. The August 2013 sampling of wells using low-flow for VOCs and lead showed no exceedances. The report recommends VOC sampling of well 283MW02 for one additional sampling round using PDBS methodology to confirm the 2013 results. The Department finds the proposal to be conditionally acceptable. If the saturated screen length exceeds 10 feet, the deployment of multiple PDBS will be required. If a decision is made to terminate ground water sampling at this parcel based on PDBS results, the Department will require confirmatory sampling using low-flow due to PDBS biasing low compared to low-flow at the Fort Monmouth site.

FTMM-64 Building 812

Historic sampling at this parcel revealed GWQS exceedances of benzene, vinyl chloride and metals. The August 2013 sampling of wells using low-flow for VOCs and lead showed no exceedances. The report recommends VOC sampling of well 812MW04 for one additional sampling round using PDBS methodology to confirm the 2013 results (however Section 5.0 recommends sampling be continued on an annual basis). The Department finds the proposal to be conditionally acceptable. If the saturated screen length exceeds 10 feet, the deployment of multiple PDBS will be required. If a decision is made to terminate ground water sampling at this

parcel based on PDBS results, the Department will require confirmatory sampling using low-flow due to PDBS biasing low compared to low-flow at the Fort Monmouth site.

FTMM-66 Building 886

Historic sampling at this parcel revealed GWQS exceedances of benzene, VOC TICs, arsenic and lead. The August 2013 sampling results from wells using low-flow showed the exceedance of the GWQS for SVOC TICs. The report recommends that sampling at this parcel be discontinued. The Department finds the recommendation unacceptable. Total SVOC TICs exceeded the GWQS of 500 ppb in wells 886RW01 and 886RW06. Ground water monitoring of wells 886RW01, 886RW06 and 886RW08 shall continue for SVOC+TICs using low-flow methodology.

FTMM-68 Building 700

There are no historic sampling results for this parcel. The August 2013 sampling results of wells using PDBS showed the exceedance of the GWQS for PCE, TCE, cis-1,2-DCE and vinyl chloride in wells 565MW01 and 565MW01D. The report recommends quarterly ground water sampling for VOC+TICs using PDBS for these 2 wells. The Department agrees with the recommendation of quarterly sampling, however, has concerns regarding the use of PDBS for long-term monitoring at this parcel. Unlike the other Fort Monmouth parcels, there are no historical ground water sampling data for comparison with the PDBS results. The DEP's Field Sampling Procedures Manual states that "the intended application of Passive Diffusion Bag Samplers (PDBS) is for long-term monitoring of volatile organic compounds (VOCs) in ground water at well-characterized sites." The Department would find long-term sampling of the wells using PDBS acceptable if low-flow sampling is conducted concurrently once or twice for comparison.

Finally, each of the above comments speak only to the ground water findings and recommendations included in the referenced submittal, rather than to the ground water at the entire site.

Please contact this office if you have any questions.

Sincerely,

Linda S. Range

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C: Joe Pearson, Calibre
Rick Harrison, FMERA
Julie Carver, Matrix
Frank Barricelli
Daryl Clark, BGWPA