



State of New Jersey

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November 14, 2016

William R. Colvin
BRAC Environmental Coordinator
OACSIM – U.S. Army Fort Monmouth
PO Box 148
Oceanport, NJ 07757

Re: *Annual (Fourth Quarter) 2015 Groundwater Sampling Report dated September 2016*
Fort Monmouth
Oceanport, Monmouth County
PI G000000032

Dear Mr. Colvin:

The New Jersey Department of Environmental Protection (NJDEP) has completed review of the referenced report, received September 29, 2016, prepared by Parsons to support the Remedial Investigation (RI), Feasibility Study (FS), and Decision Documents project at Fort Monmouth. An annual ground water sampling event was conducted at twelve (12) FTMM sites between September 30, 2015 and December 15, 2015. Sampling methodologies used included low-flow purging and sampling (LFPS) and passive diffusion bag samplers (PDBS). Comments on each FTMM site are as follows:

FTMM-02 Landfill

Historic sampling results at FTMM-02 have exhibited exceedances of the Ground Water Quality Standard (GWQS) for VOCs. Results from the 2015 annual sampling event exceeded the GWQS for MTBE and TBA in M2MW22. The report recommends biennial sampling of M2MW03, M2MW10 and M2MW22 as part of the biennial sampling requirements for the existing CEA for this site. The exiting CEA will also be revised to include TBA and MTBE. The recommendation is acceptable. At any point where a decision is made to terminate ground water sampling at this parcel, confirmatory sampling using low-flow methodology is required.

FTMM-05 Landfill

Historic sampling results at FTMM-05 have exhibited exceedances of the GWQS for PCE, TCE and vinyl chloride. Results from the 2015 annual sampling event exceeded GWQS for PCE in wells M5MW11, M5MW16, M5MW20 and M5MW23. The report recommends the

establishment of a CEA, with biennial ground water sampling of wells M5MW11, M5MW16, M5MW20 and M5MW23 for VOCs as the “preferred remedy”. Although an essential component of certain ground water remedies, a CEA is an institutional control rather than a remedy. A remedial action proposal, e.g. Monitored Natural Attenuation (MNA), in accordance with the applicable requirements of N.J.A.C. 7:26E-5.1, must be submitted to address the ground water contaminants. At such time as the formal proposal for a CEA is to be submitted, the proposal must be accompanied by a CEA/WRA Fact Sheet Form; the form and form instructions may be obtained from the Site Remediation website at www.nj.gov/dep/srp/srra/forms/. Submittal of a draft CEA/WRA Fact Sheet Form is recommended to allow for DEP confirmation of the CEA components and boundaries.

FTMM-08 Landfill

Historic sampling results at FTMM-08 exhibited exceedances of the GWQS for pesticides, benzene, PCE and lead. Results from the 2015 annual sampling event exceeded the GWQS for PCE, lead and pesticides. The 2016 RIR for FTMM-08, however, indicated manganese is also a contaminant of concern which requires monitoring. The submittal recommends the establishment of a CEA, with biennial ground water sampling for the contaminants of concern from selected wells. As above, although an essential component of certain ground water remedies, a CEA is an institutional control rather than a remedy. A remedial action proposal, e.g. Monitored Natural Attenuation (MNA), in accordance with the applicable requirements of N.J.A.C. 7:26E-5.1, must be submitted to address the ground water contaminants. At such time as the formal proposal for a CEA is to be submitted, the proposal must be accompanied by a CEA/WRA Fact Sheet Form; the form and form instructions may be obtained from the Site Remediation website at www.nj.gov/dep/srp/srra/forms/. Submittal of a draft CEA/WRA Fact Sheet Form is recommended to allow for DEP confirmation of the CEA components and boundaries.

FTMM-18 Landfill

Historic sampling results at FTMM-18 exhibited exceedances of the GWQS for benzene and 1,2-DCA. Results from the annual 2015 sampling event exceed the GWQS for benzene in well 296MW06. In the October 2015 RIR for FTMM-18, it was indicated that manganese is also a contaminant of concern, which requires monitoring. The report recommends the establishment of a CEA as the preferred remedy, with biennial ground water sampling for the contaminants of concern from selected wells. As above, although an essential component of certain ground water remedies, a CEA is an institutional control rather than a remedy. A remedial action proposal, e.g. Monitored Natural Attenuation (MNA), in accordance with the applicable requirements of N.J.A.C. 7:26E-5.1 and guidance documents, must be submitted to address the ground water contaminants. At such time as the formal proposal for a CEA is to be submitted, the proposal must be accompanied by a CEA/WRA Fact Sheet Form; the form and form instructions may be obtained from the Site Remediation website at www.nj.gov/dep/srp/srra/forms/. Submittal of a draft CEA/WRA Fact Sheet Form is recommended to allow for DEP confirmation of the CEA components and boundaries.

FTMM-22 - Former Wastewater Treatment Lime Pit

Historic sampling results at FTMM-22 exhibited exceedances of the GWQS for TCE and vinyl chloride. Results from the annual 2015 sampling event also exceeded the GWQS for TCE and vinyl chloride. Long-term ground water monitoring has been suspended while the remedial investigation/feasibility study (RI/FS) is being conducted. Upon completion of the RI/FS, a revised monitoring program will be proposed. The recommendation is acceptable.

FTMM-53 - Former Gas Station at Building 699

Historic sampling results at FTMM-53 exhibited exceedances of the GWQS for benzene, PCE, TCE, TBA, VOC TICs and lead. Results from the 2015 annual sampling event exceeded the GWQS for benzene, PCE, 1,2,4-trimethylbenzene, and VOC TICs. Long-term ground water monitoring has been suspended while the RI/FS is being conducted. Upon completion of the RI/FS, a revised monitoring program will be proposed. The recommendation is acceptable.

FTMM-56 – Building 80 Petroleum Release

Historic sampling results at FTMM-56 exhibited exceedances of the GWQS for pesticides and metals. Recently, one additional round of sampling from two wells was required; results from the 2015 annual sampling event found a single exceedance of the GWQS, of arsenic, however, the arsenic concentration is determined to be representative of background conditions, and no further action for ground water is necessary.

FTMM-57 - Building 108 UST Gasoline Release

Historic sampling results at FTMM-57 exhibited an exceedance of the GWQS for lead. Results from the 2015 annual sampling event were below the GWQS for lead; no further action for ground water is acceptable.

FTMM-58 - Building 2567 UST Gasoline

Historic sampling results at FTMM-58 exhibited exceedances of the GWQS for TBA. Results from the 2015 annual sampling event continue to exceed the GWQS for TBA. The submittal recommends continued sampling of well 2567MW01 and the addition of downgradient well 2567MW05 for TBA. One additional round of sampling is recommended for monitoring of 2567MW03 for TBA to confirm compliance for same. The recommendations are acceptable.

Evaluations regarding potential benzene exceedances relative to FTMM-58 continue under separate investigative efforts.

FTMM-64 - Building 812 UST Gasoline

Historic sampling results at FTMM-64 exhibited exceedances of the GWQS for benzene, vinyl chloride and metals. Although results from the 2015 annual sampling event were below the GWQS for contaminants of concern, due to previous analytical results, the submittal recommends continued annual sampling of well 812MWS04 for VOCs. The recommendation is acceptable. If a decision is made to terminate ground water sampling at FTMM-64, confirmatory sampling using the low-flow methodology will be required.

FTMM-66 - Building 886 Former AST

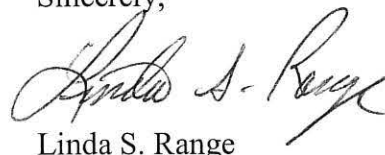
Historic sampling results from wells at FTMM-66 exhibited exceedances of the GWQS for SVOC TICs; results from the 2015 annual sampling event did not exceed the GWQS for SVOC TICs. The submittal recommends the ground water sampling at FTMM-66 be discontinued. The recommendation is acceptable; no further action for ground water is necessary.

FTMM-68 - Building 700 Former Dry Cleaners

Historic sampling results have shown exceedances of the GWQS for PCE, TCE, cis-1,2-DCE and vinyl chloride in ground water. Results from the 2015 annual sampling event confirmed these chlorinated VOCs continue to exceed GSQS in ground water. Long-term ground water monitoring has been suspended until such time as the RI/FS is completed. Upon completion of the RI/FS, a revised monitoring program will be proposed. The recommendation is acceptable.

Please contact this office if you have any questions.

Sincerely,



Linda S. Range

C: James Moore, USACE
Cris Grill, Parsons
Joe Pearson, Calibre
Rick Harrison, FMERA
Joe Fallon, FMERA
Daryl Clark, BGWPA