

**ACTION MEMORANDUM FOR THE
WESTERN PORTION OF PARCEL 49
FORT MONMOUTH, OCEANPORT,
MONMOUTH COUNTY, NEW JERSEY**

**BRAC 05 Facility
Contract W912DY-09-D-0062
Task Order: 0012, Project No. 369857**

Submitted To:
**U.S. Army Engineering and Support Center
Huntsville, Alabama**



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ACTION MEMORANDUM
WESTERN PORTION OF PARCEL 49
FORT MONMOUTH, NEW JERSEY

APPROVAL

This Action Memorandum presents the selected removal action for contaminated soil at the western portion of Parcel 49 located at Fort Monmouth in Oceanport, Monmouth County, New Jersey. The U.S. Army is the lead agency at Fort Monmouth under the Defense Environmental Restoration Program, 10 U.S.C. § 2701, and the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. §§ 9601 et seq., as amended (CERCLA). This Action Memorandum is consistent with CERCLA, as amended, and the National Oil and Hazardous Substances Pollution Contingency Plan, 40 CFR Part 300. This Action Memorandum will be incorporated into the Administrative Record file for Fort Monmouth, which is available for public review at the Eastern Branch of the Monmouth County Library, 1001 Route 35, Shrewsbury, New Jersey 07702. This document, presenting the results of selected removal action with a present worth cost estimate of \$125,000, is approved by the undersigned.



Thomas E. Lederle
Chief, BRAC Division
Department of the Army Assistant Chief of Staff Installation Management

17 MAY 2018
Date

1.0 STATEMENT OF BASIS AND PURPOSE

This Action Memorandum describes the selected time critical removal action (TCRA) of soil contaminated with polynuclear aromatic hydrocarbons (PAHs) in the western portion of Parcel 49 in Fort Monmouth, New Jersey. The purpose of this Action Memorandum is to document the U.S. Army's decision to undertake the TCRA. The eastern portion of Parcel 49 in the immediate vicinity of Building 283 (Squier Hall) has been addressed under a separate TCRA. The New Jersey Department of Environmental Protection (NJDEP) concurred (15 June 2017) with the U.S. Army's determination that no further action was necessary in the eastern portion of Parcel 49; the eastern portion of Parcel 49 was transferred to the Fort Monmouth Economic Revitalization Authority (FMERA). Therefore, this TCRA addresses only the western portion of Parcel 49, which is referred to as the Site in this TCRA.

This Action Memorandum was developed in accordance with: the Defense Environmental Restoration Program (DERP), 10 United States Code (U.S.C.) Section 2701; the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. §§ 9601 et seq., as amended (CERCLA); and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 Code of Federal Regulations (CFR) Part 300 (USEPA 1991). The U.S. Army is the lead agency for Fort Monmouth in accordance with CERCLA and Executive Order 12,580. The U.S. Army makes remedial decisions for Fort Monmouth in consultation with the NJDEP, the state support agency.

2.0 SITE CONDITIONS AND BACKGROUND

The location of Parcel 49, indicating both the eastern portion and the Site (western portion), is shown on **Figure 1**. A description of Parcel 49 is provided in Section 2.1. Previous investigation activities are summarized in Section 2.2; investigative results are summarized in Section 2.3.

2.1 Site Setting and History

The Main Post (MP) of FTMM was established in 1917 as Camp Little Silver. The name of the Camp was changed shortly thereafter to Camp Alfred Vail. The initial mission of the Camp was to train Signal Corps operators for service in World War I. After the war, Camp Alfred Vail was designated as the site of the Signal Corps School. In 1925, the facility became a permanent post, and its name was changed to Fort Monmouth (FTMM). The primary mission of FTMM was to provide command, administrative, and logistical support for Headquarters, U.S. Fort Monmouth Communications and Electronics Command (CECOM) (Shaw, 2012). CECOM is a major subordinate command of the U.S. Army Materiel Command (AMC). FTMM was the center for the development of Fort Monmouth's Command and Control Communications, Computers, Intelligence, Sensors and Reconnaissance (C4ISR) systems, formerly the primary tenants of the Fort. FTMM has a long history of research and development (R&D) activity, mostly related to communications and electronic equipment. For the completion of these research activities, FTMM operated a variety of laboratories.

In 1934, FTMM laboratory operations were consolidated in a new facility, Squier Laboratory, and this facility continued to be the principal laboratory on post until 1954 when the new R&D facility, Myer Center (Building 2700), was opened. The Squier Laboratory Complex supported the Signal Corps Laboratories' research into batteries and electronics coatings. Environmental concerns were identified for some of the

in most of the samples. NJDEP revised the RDCSRS for multiple PAHs on 18 September 2017 based on lower toxicity values; regardless, multiple soil PAH results continued exceed the revised RDCSRSs.

3.0 THREATS TO PUBLIC HEALTH, WELFARE, AND THE ENVIRONMENT

Concentrations of PAHs in soil Site concentrations were compared to USEPA RSLs to evaluate the potential effects of contaminants in soil on human health and the environment. The results of these comparisons were used to evaluate the need for soil removal and to identify the general effectiveness of the proposed removal action.

3.1 Risk Assessment Evaluation

A screening evaluation was performed to evaluate the need for soil removal at the Site to reduce the threat to human health. **Table 3** presents the maximum detected concentrations of PAHs. These maximum concentrations exceed the USEPA Residential RSLs for several analytes, indicating a potential threat to human health.

Table 3. Maximum COC Concentrations in Soil

Contaminant	Maximum Concentration (mg/kg)	USEPA RSL ¹ (mg/kg)
benzo(a)anthracene	27	1.1
benzo(a)pyrene	21.1	0.11
benzo(b)fluoranthene	18.5	1.1
benzo(k)fluoranthene	7.5	11
chrysene	31.5	110
dibenz(a,h)anthracene	3.8	0.11
dibenzofuran	0.34J	7.3
indeno(1,2,3-cd)pyrene	11.1	1.1
naphthalene	85	3.8
1. USEPA RSLs for Residential Soil, based on target risk of 1E-06 and target hazard quotient of 0.1. Effective June 2017 (USEPA, 2017). NA – not analyzed ND – not detected		

The Baseline Ecological Evaluation (BEE; Shaw, 2012) concluded that constituents at the Main Post of FTMM (including the Site) were unlikely to have a deleterious effect on sensitive ecological receptors or habitats, and additional ecological assessments were not warranted or recommended. Potentially complete terrestrial and aquatic pathways for ecological receptors are incomplete at the Site due to lack of viable habitat.

4.0 REGULATORY FRAMEWORK AND ENDANGERMENT DETERMINATION

This section summarizes the regulatory framework for the TCRA at the Site and presents the objectives of the removal action.

Table 4. Estimated Costs for Alternative 2: Soil Removal and Offsite Disposal

Phase Name	Year 1
Work Plan	\$10,000
Soil Removal	\$25,000
Transportation and Disposal	\$65,000
Restoration	\$10,000
U.S. Army Corps Costs	\$15,000
Present Worth Total Cost:	\$125,000

6.0 EXPECTED CHANGE IN THE SITUATION SHOULD THE ACTION BE DELAYED OR NOT TAKEN

Delaying the implementation of the proposed removal action or taking no action could result in potential threats to public health and the environment as well as delays in the redevelopment of the property and transfer of the Site from the U.S. Army to the FMERA.

7.0 PUBLIC INVOLVEMENT AND PARTICIPATION

This Action Memorandum will be made available for a 30-day public review and comment period from 31 May to 29 June 2018 and will be posted on the FTMM Environmental Restoration Program website (<http://www.pica.army.mil/ftmonmouth/>) and placed in the FTMM Environmental Restoration Public Information Repository (the Administrative Record) at the following location:

Monmouth County Library, Eastern Branch
1001 Route 35, Shrewsbury, NJ
Phone: (732) 683-8980
Hours: Mon-Thurs, 9am-9pm; Fri-Sat, 9am-5pm; and Sun, 1pm-5pm

Appendix A includes the public press release regarding the TCRA and the public notice requesting comments.

8.0 CONCLUSIONS

The soil removal and backfill alternative selected as the final remedy for the PAH-contaminated soil at the Site best meets the RAO and NCP criteria because it:

- Is technically feasible based on commonly used construction techniques and demonstrated proven approaches;
- Is administratively feasible and eliminates the requirement to conduct CERCLA 5-Year Reviews;
- Provides a high degree of long-term public health and environmental protection through the removal of the source of the contaminated soil;
- Complies with chemical- and action-specific ARARs;
- Imposes no restrictions on future use of the site;
- Meets the evaluation criteria of effectiveness, implementability, and cost.

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- Facilitates transfer of the property to the FMERA; and
- Serves as a final action at the site.

9.0 REFERENCES

- New Jersey Department of Environmental Protection (NJDEP), 2012. Letter to Army; Re: *March 2012 Army Response to NJDEP Correspondence Letter Dated October 28, 2008, Fort Monmouth, NJ*. July 10.
- NJDEP, 2015. Letter to Army; Re: *Revision 1 – Final Environmental Condition of Property Supplemental Phase II Site Investigation Work Plan Addendum for Parcels 28, 38, 39, 49, 57, 61, and 69 dated November 2015*. December 30.
- Parsons, 2015. *Final Environmental Condition of Property Supplemental Phase II Site Investigation Work Plan for Parcels 28, 38, 39, 49, 57, 61, and 69*. Submitted to U.S. Army Engineering and Support Center, Huntsville, AL. Revision No. 1. August.
- Shaw, 2012. *Final Fort Monmouth Main Post and Charles Wood Area Baseline Ecological Evaluation Report, U.S. Army Garrison Fort Monmouth, Fort Monmouth, New Jersey*. Prepared for the Army Corps of Engineers, Baltimore District. Rev. 1.
- United States (US) Army Base Realignment and Closure (BRAC), 2007. *Environmental Condition of Property Report – Fort Monmouth, Monmouth County, New Jersey*. Final. January 29.
- US Army BRAC, 2008. *Site Investigation Report, Fort Monmouth*. Final. July 21. USEPA, 2015. Regional Screening Levels Summary Table (based on target risk of 1E-06 and target hazard quotient of 0.1). November.
- US Environmental Protection Agency (USEPA), 2015. Regional Screening Levels Summary Table (based on target risk of 1E-06 and target hazard quotient of 0.1). November.
- USEPA, 2017. Regional Screening Levels Summary Table (based on target risk of 1E-06 and target hazard quotient of 0.1). June. Available at: <https://semspub.epa.gov/work/03/2245071.pdf>.

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Figure 1
Parcel 49 Site Location

Figure 2

Parcel 49 Comparison of Soil Results for PAHs to NJDEP Direct Contact Standards

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Figure 3

Parcel 49 Soil Sample Locations – Building 293

Figure 4

Parcel 49 Soil Sample Locations – Buildings 291/296

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Table 1

Detected Soil Analytes and Comparison to NJDEP Soil Criteria

Table 2

Detected Soil Analytes and Comparison to USEPA Regional Screening Levels

