

**New Jersey Natural Gas (NJNG) Long Branch Plant Site Update
New Jersey Department of Environmental Protection (NJDEP)
Site Remediation & Waste Management Program
September 2006**

This report is provided in response to a request by the Concerned Citizens Coalition of Long Branch (CCC) for monthly updates from the Site Remediation and Waste Management Program (SRWM) on work conducted and planned at four areas associated with the former Long Branch Manufactured Gas Plant (MGP). These areas are:

- the former MGP (including the former Conrail properties, eastern off-site property, and former Jerry Morgan Park)
- the off-site portion of Troutmans Creek that flows north of the MGP
- residential areas where the community has expressed concern about potential soil contamination (Long Branch Avenue, Seaview Avenue, Grant Court and Ellis Avenue)
- the former Seaview Manor housing complex

All work is consistent with NJDEP's Technical Requirements for Site Remediation, which were developed to ensure remedial actions protect human health and the environment.

For historical information about activities that NJDEP and NJNG have conducted at these areas, please refer to the monthly updates NJDEP has provided to CCC since January 2005. The updates are available at www.nj.gov/dep/srp/community/highlights.htm. For more information, see NJDEP's Environmental Justice web page at <http://www.nj.gov/dep/ej>.

1) Long Branch Plant Red Brick Building

In July 2006 NJDEP issued comments on NJNG's Remedial Investigation Report (RIR) and Addendum Letter for this area, which were submitted in January 2006 and April 2006, respectively. Based on its review of these documents, NJDEP has determined that additional soil sampling must be conducted to verify that the volatile organic compounds (PCE and TCE) and polycyclic aromatic hydrocarbons in the soil have been fully delineated. NJDEP gave NJNG two options for accomplishing this task: mobilize for another phase of delineation sampling or submit a Remedial Action Work Plan (RAWP) that includes post-remediation sampling. NJNG has elected to submit a RAWP with post-remediation sampling. NJDEP expects to receive the RAWP in the fall of 2006.

APSC, On-Site Portion of Troutmans Creek and remainder of MGP

Pursuant to the court order issued as a result of earlier litigation between NJNG and Atlantic Plumbing and Supply Company (APSC), NJNG took possession of the APSC property in September 2006 and began demolishing the building. NJDEP has reviewed NJNG's revised RAWP dated May 2006 that consolidated the plans for the APSC property, the on-site portion of Troutmans Creek and the remainder of the former MGP site and issued written comments on September 7, 2006. In the comment letter, NJDEP required NJNG to significantly expand the remedial actions in order to maximize the removal of free product from these areas. NJNG must



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OFFICE OF COMMUNITY RELATIONS
1-800-253-5647
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submit a revised RAWP Addendum that outlines its plans to accomplish these requirements. The timing for submittal of the revised RAWP Addendum is being discussed.

Soil Gas Investigation

NJNG's February 2006 RIR on the soil gas investigation concluded vapor intrusion was not a concern for the Talco property. NJDEP accepted this conclusion and approved the RIR in May 2006. As for the APSC property, NJNG is demolishing the building in preparation for the remedial action for this area, thereby eliminating the need to evaluate vapor intrusion for the current structure. NJNG must still evaluate all of the former MGP as specified by NJDEP's Vapor Intrusion Guidance on future use of undeveloped parcels.

Ground Water Investigation

NJNG submitted a Draft RIR/Draft Ground Water Pilot Testing Report (GWPTR), a Draft Remedial Action Selection Report (RASR) and a Draft Phase II Ground Water Monitoring Report (GWMR) in March 2006. The Draft RIR details efforts to define the extent of the on-site dense non-aqueous phase liquid (DNAPL) and the Draft GWPTR summarizes the results of the ground water treatment studies. The Draft RASR presents the remedies NJNG plans to select to remediate the DNAPL and dissolved ground water contamination. NJDEP reviewed these documents and issued a conditional approval letter for the Phase II Ground Water Monitoring Report and a comment letter for the remaining documents in July 2006. The approval and comment letters required NJNG to conduct the following tasks:

- 1) Continue the pilot test study to obtain data to support the remedy selection and report the data in the quarterly ACO progress report
- 2) Complete delineation of the DNAPL plume
- 3) Complete delineation of the dissolved contaminant plume

NJNG is required to submit a Remedial Investigation Work Plan (RIWP) to address items 2 and 3 in November 2006.

2) Off-Site Portion of Troutmans Creek

NJNG submitted a Draft Ecological Risk Assessment (ERA) Work Plan in March 2006 that outlined proposals for tasks that include, but are not limited to conducting a benthic community survey, sediment toxicity testing, and sediment sampling for analysis of site-related contaminants. NJDEP issued a conditional approval for the ERA Work Plan in May 2006. NJNG conducted the first sampling event in June 2006 and initiated the second one in September 2006.

NJNG submitted a Draft RAWP for Troutmans Creek in March 2006. NJDEP reviewed the Draft RAWP and CCC's comments on this document and issued a comment letter in August 2006. NJDEP advised NJNG in the comment letter that it must first complete the ERA and delineate soil and product contamination in the creek (see next paragraph) before submitting a

revised RAWP for this area. The revised RAWP for the off-site portion of Troutmans Creek is due in April 2007.

In August 2006, NJNG submitted a RIWP outlining plans to delineate free and residual product along with soil contamination on the banks of Troutmans Creek. NJDEP issued a conditional approval letter for the RIWP on September 14, 2006. NJDEP expects NJNG to submit an RIR summarizing the findings of the soil investigation by January 31, 2007.

3) Off-Site Residential Areas

NJDEP issued an RIR in February 2006 that summarized the findings of the soil sampling it conducted on Long Branch Avenue, Seaview Avenue, Ellis Avenue and Grant Court. The investigation revealed that two shallow soil samples collected from beneath the pavement on Ellis Avenue contained semi-volatile organic compounds and a metal at levels exceeding NJDEP's soil cleanup criteria. It also revealed that two deep soil samples (collected more than six feet below grade) at Grant Court contained semi-volatile organic compounds and metals above NJDEP's soil cleanup criteria. In addition, one surface soil sample near a dumpster in the Grant Court housing development contained arsenic above NJDEP's soil cleanup criteria.

The Long Branch Housing Authority (LBHA) placed gravel over the area near the dumpster and installed a temporary fence around it. LBHA subsequently conducted a remedial investigation to delineate the extent of contamination on Grant Court. NJDEP issued an approval letter for LBHA's RIR and RIR Addendum for the deep soil contamination at Grant Court in August 2006. The approval letter confirmed that LBHA has adequately delineated the soil contamination in this area and requested that LBHA submit a RAWP to address the contamination. NJDEP expects to receive the RAWP in October or November 2006.

NJDEP will investigate the extent of the soil contamination beneath the pavement at Ellis Avenue. The timing of NJDEP's investigation is being discussed.

4) Seaview Manor

NJDEP issued a conditional approval letter in April 2006 for NJNG's Revised Remedial Action Report (RAR) for Block 400, Lot 7 that required revisions to the deed notice. NJNG has made the revisions, including those specified in NJDEP's September 13, 2006 letter. NJNG and LBHA are working together to record the draft deed notice for Block 400, Lot 7 in October 2006.

NJNG submitted an RAR for the remainder of the LBHA properties and adjacent properties in February 2006. NJDEP reviewed the RAR and CCC's comments on the submittal and issued a comment letter in August 2006. NJDEP is requiring NJNG to submit a RIWP Addendum with proposals to satisfy the post-remediation sampling requirements for Block 400, Lot 6 and further investigate potential soil contamination beneath Seaview Avenue. The RIWP Addendum is due

in November 2006 and NJDEP is recommending that NJNG integrate the findings for this area into the RAR Addendum for the culvert area, which is due in January 2007.

Culvert Status

The mobilization efforts related to the removal of the culvert and any underlying contamination began in late September 2006. NJDEP expects the remedial action in this area to be completed in early October 2006.

Related Information

LBHA Activities

LBHA submitted an RIR in May 2006 that summarizes the soil and ground water sampling it conducted in the vicinity of the two underground storage tanks (USTs) formerly located on Block 400, Lot 7. NJDEP reviewed this report and issued a comment letter in August 2006 that required LBHA to conduct a vapor intrusion evaluation for this area. NJDEP received a report on the vapor intrusion evaluation in September 2006 and this document is currently being reviewed.

LBHA also submitted a RAWP for Block 400 Lot 7 in February 2006 that details plans for installation the storm water and sanitary sewer lines. NJDEP issued a conditional approval of the RAWP in May 2006. This work was completed in August of 2006, along with decontamination of the sheet piling installed within Troutmans Creek. NJDEP expects to receive an RAR documenting all of these activities in November 2006.