New Jersey Natural Gas (NJNG) Long Branch Plant Site Update New Jersey Department of Environmental Protection (NJDEP) Site Remediation & Waste Management Program October 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 https://www.nj.gov/dep/ej.

1) Long Branch Plant

Red Brick Building

Based on its review of NJNG's Remedial Investigation Report (RIR) and Addendum Letter for this area, 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. To address this requirement, NJNG plans to submit a Remedial Action Work Plan (RAWP) that includes post-remediation sampling. NJDEP expects to receive the RAWP on or about November 22, 2006.

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

NJNG took possession of the APSC property in September 2006 and began demolishing the building. NJDEP reviewed NJNG's RAWP that consolidated plans for the APSC property, onsite portion of Troutmans Creek and remainder of the former MGP, and issued comments in September 2006 that require NJNG to significantly expand the remedial actions in order to maximize the removal of free product from these areas. NJDEP received the revised RAWP Addendum that outlines NJNG's plans to accomplish these requirements on October 31, 2006.

Soil Gas Investigation

NJNG's February 2006 RIR on the soil gas investigation concluded vapor intrusion was not a concern for the Talco property and NJDEP has accepted this conclusion. NJNG is demolishing the building at the APSC property, thereby eliminating the need to evaluate vapor intrusion for



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the 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

NJDEP received a Draft Remedial Investigation Work Plan (RIWP) on October 26, 2006 containing proposals in response to the NJDEP's comment letters dated July 21, 2006, July 28, 2006, and August 18, 2006. In summary, the proposals address requirements to further delineate both dissolved ground water contamination and dense non-aqueous phase liquid (DNAPL). The RIWP also contains proposals to conduct post-remediation soil sampling on Block 400 Lot 6 and additional soil investigation within the Seaview Avenue right of way. NJNG is also continuing the pilot test study to obtain data to support remedy selection and reports the data to NJDEP in quarterly ACO progress reports.

2) Off-Site Portion of Troutmans Creek

NJNG has completed the fieldwork described in the Draft Ecological Risk Assessment (ERA) Work Plan dated March 2006. The results for the proposed 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 will be summarized in the Draft RIR (ERA) that NJNG has proposed to submit to NJDEP on December 11, 2006.

NJDEP has reviewed NJNG's Draft RAWP for Troutmans Creek dated March 2006 and issued a comment letter in August 2006. NJDEP advised NJNG 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 was due in April 2007, but now NJNG is proposing to submit this RAWP on March 5, 2007.

In September 2006, NJDEP issued a conditional approval letter for NJNG'S RIWP outlining plans to delineate free and residual product along with soil contamination on the banks of Troutmans Creek. NJNG initiated the fieldwork described in the RIWP on October 30, 2006, and has proposed to submit the RIR summarizing the findings to NJDEP on March 5, 2007. This date is later than the January 31, 2007 due date that NJDEP recommended, but coincides with the due date NJNG has proposed for the RAWP discussed in the previous paragraph.

NJDEP is still evaluating this proposed schedule and will make a decision in November 2006.

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 adequately delineated the soil contamination in this area and requested LBHA submit an RAWP for Grant Court. NJDEP receive the RAWP on October 11, 2006.

NJDEP will investigate the extent of the soil contamination beneath the pavement at Ellis Avenue. The timing of NJDEP's investigation is still 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. NJDEP received a second revision on October 3, 2006 and issued an approval on October 12, 2006. Due to time constraints, LBHA delivered the deed notice to the Monmouth County Clerk on October 5, 2006 based on a verbal approval from NJDEP and the Monmouth County Clerk recorded the deed notice on October 11, 2006.

The NJDEP issued three, separate no further action (NFA) letters for Block 400 Lot 7, all of which were dated October 31, 2006. One was for the unrestricted use remedial action NJNG conducted for areas A and B, another was for the restricted use remedial action NJNG conducted on the southeast corner of this parcel, and the last was for the restricted use remedial action performed for LBHA's two former underground storage tanks.

NJNG reviewed NJNG's RAR (Arcadis, 2/06) for the remainder of the LBHA properties and adjacent properties and issued a comment letter in August 2006. NJDEP required NJNG to submit an 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 was integrated into the RIWP described under the ground water investigation section of this update and was received by NJDEP on October 26, 2006.

Culvert Status

NJNG mobilized its contractor to remove the culvert and any underlying contamination in late September 2006 and initiated the remedial action in early October 2006. NJDEP conducted a site visit with CCC representatives Avery Grant and Joe Turpin on October 20, 2006. As of that date, the old culvert had been removed, the soil contamination in the area had been excavated to the proposed depth of twelve feet, the excavation had been partially backfilled with clean fill,

and the new HDPE culvert was being installed. In summary, substantial completion of the remedial action has been achieved with activities such as contractor demobilization, restoration, and reporting currently underway or pending. NJNG proposes to submit the RAR Addendum for the culvert area to NJDEP on December 18, 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 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 the Vapor Intrusion Report and another document entitled Launch Pit Soil Sampling Report in September 2006. Both reports were approved by the NJDEP in separate letters, both of which were dated October 13, 2006. Based on the contents of these and other documents (discussed above) the NJDEP issued the October 31, 2006 NFA letter to LBHA for its two former underground storage tanks.

Installation of the storm water and sanitary sewer lines was completed in August 2006, along with decontamination of the sheet piling installed within Troutmans Creek. The RAR documenting all of these activities is due in November 2006. LBHA has requested an extension until December 15, 2006 to submit the RAR. NJDEP is considering this request and will make a decision in November 2006.