



FINAL

RECORD OF DECISION

FOR AOC 1

ABANDONED DUMPING STATION

NAVAL AIR STATION - CAPE MAY
CAPE MAY, NEW JERSEY
FUDS PROJECT NUMBER C02NJ095101

NOVEMBER 2025

Prepared for:
US Army Corp of Engineers
New England District
Concord, Massachusetts

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ABBREVIATIONS, ACRONYMS, AND SYMBOLS

AOC	Area of Concern
ARAR	Applicable or Relevant and Appropriate Requirement
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
COPCs	Contaminants of potential concern
COPECs	Contaminants of potential ecological concern
DERP	Defense Environmental Restoration Program
DoD	Department of Defense
FUDS	Formerly Used Defense Sites
HTRW	Hazardous, Toxic, and Radioactive Waste
LUC	Land Use Controls
NAS	Naval Air Station
NJDEP	New Jersey Department of Environmental Protection
RAO	Remedial Action Objective
ROD	Record of Decision
RSJV	Renova-Sovereign Joint Venture
TRACENCM	Training Center Cape May
USACE	United States Army Corps of Engineers
USCG	United States Coast Guard
USC	United States Code
USEPA	United States Environmental Protection Agency

PART 1: DECLARATION

This Record of Decision (ROD) presents the selected decision of No Further Action to address Hazardous, Toxic, and Radioactive Waste (HTRW) in soil, sediment, and groundwater from past Department of Defense (DoD) activities at the Naval Air Station (NAS) Cape May, Area of Concern [AOC] 1, Abandoned Dumping Station located in Cape May County, New Jersey (Site) (**Figure 1**). This ROD was prepared by Renova Environmental Services and Sovereign Consulting, Inc. Joint Venture (Renova-Sovereign Joint Venture [RSJV]) on behalf of the U.S. Army Corps of Engineers (USACE) New England District.

NAS Cape May was established as a Formerly Used Defense Site (FUDS) Property under the Defense Environmental Restoration Program (DERP) in 1995. AOC 1, Abandoned Dumping Station, was authorized as HTRW Project No. C02NJ095101 to investigate an area where historical dumping may have occurred from a former pier between the 1920s and 1940s, potentially resulting in impacts to the environment (USACE, 1994a). Site assessments and remedial investigations of soil, sediment, and groundwater were conducted, and USACE determined there is no unacceptable risk from Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) hazardous substances related to past DoD activities. Therefore, no remedial action for AOC 1, Abandoned Dumping Station, is required under CERCLA, and the selected decision is No Further Action.

1.1 Project Name and Location

NAS Cape May AOC 1, Abandoned Dumping Station is an approximately one-acre sized area of shoreline located on U.S Coast Guard (USCG) Training Center Cape May (TRACENCM), which was previously known as Naval Air Station Cape May. TRACENCM is a secure USCG facility with no public access. TRACENCM is located approximately 50 miles south of Atlantic City.

AOC 1, Abandoned Dumping Station is currently bound to the west by a dirt access road and beyond that by a Confined Disposal Facility, which is a surface impoundment made of earthen berms to dewater dredge spoils from the periodic dredging of the Cape May Inlet (**Figure 1**). The Site is currently bound to the north by Cape May Harbor and east by the Cape May Inlet. The southern end of the Site is adjacent to the Cape May jetty and the Atlantic Ocean. Much of the estimated footprint of AOC 1, Abandoned Dumping Station is now underwater, due to over 100 ft of shoreline erosion since 1931.

1.2 Statement of Basis and Purpose

This ROD presents the selected decision of No Further Action for AOC 1, Abandoned Dumping Station. The USACE FUDS program is conducting response activities in accordance with the DERP statute (10 US Code [USC] § 2701 et seq.), the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) (42 USC § 9601 et seq.), and the National Oil and Hazardous Substances Pollution Contingency Plan, more commonly known as the National Contingency Plan (NCP) (40 Code of Federal Regulations [CFR] Part 300). The USACE is the lead agency for this project under FUDS-DERP. The USACE provides the state regulatory agency,

New Jersey Department of Environmental Protection (NJDEP), the opportunity to review and comment on project documents. The NJDEP did not concur with the selected decision of No Further Action. This project is not on the National Priorities List (NPL). The information supporting the decision is contained in the Administrative Record.

1.3 Decision Made

The selected decision is No Further Action. USACE determined that no remedial action is necessary to ensure protection of human health or the environment.

1.4 Statutory Determinations

No CERCLA Section 121 statutory determinations are necessary because no remedy is being selected. Five-year reviews are neither required nor necessary.

1.5 Authorizing Signature

This Record of Decision presents the selected decision of No Further Action at AOC 1, Abandoned Dumping Station, at the Naval Air Station (NAS) - Cape May in Cape May, New Jersey. The Department of Defense is the lead agency under the Defense Environmental Restoration Program (DERP) at the NAS - Cape May Formerly Used Defense Site, and U.S. Army Corps of Engineers has developed this Record of Decision for DoD consistent with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended, and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). This Record of Decision will be incorporated into the larger Administrative Record File for NAS - Cape May, which is available for public view at USACE New England District Headquarters at 696 Virginia Rd, Concord, MA 01742-2718. This document, presenting a selected decision with a total cost to complete (CTC) estimate recorded in the Formerly Used Defense Sites Management Information System (FUDSMIS) of \$0.00, is approved by the undersigned and pursuant to the delegated authority in the ASA (IE&E) memorandum dated 25 May 2022 subject: Assignment of Mission Execution Functions Associated with Department of Defense Lead Agent Responsibilities for the Formerly Used Defense Sites Program, and subsequent re-delegations.

08 DEC 2025

RAVI I. AJODAH, SES
Regional Programs Direction
North Atlantic Division

Date

PART 2: DECISION SUMMARY

2.1 Project Name, Location, and Brief Description

AOC 1, Abandoned Dumping Station is an approximately one-acre sized area of shoreline located on USCG TRACENCM, which was previously known as Naval Air Station Cape May. TRACENCM is a secure USCG facility with no public access. NAS - Cape May was established as a FUDS under DERP in 1995. AOC 1, Abandoned Dumping Station, was authorized as HTRW Project No. C02NJ095101 to investigate an area where historical dumping may have occurred from a former pier between the 1920s and 1940s, potentially resulting in impacts to the environment (USACE, 1994a).

USACE is the lead agency for the project. The USACE provides the state regulatory agency, NJDEP, the opportunity to review and comment on project documents.

2.2 Project History and Enforcement Activities

AOC 1, Abandoned Dumping Station is a small parcel of land located on the active TRACENCM, which is a secure USCG Station with no public access. Prior to 1918, the oceanfront portion of the property was used as an amusement park. The U.S. Government obtained the 426.8-acre TRACENCM property through a deed dated December 2, 1918. The Navy operated the property from 1918 to 1946. In 1946, the Navy conveyed 426.8-acres to the USCG (USACE, 1994a and 1994b). After World War I, AOC 1, Abandoned Dumping Station was used for airship landing and storage. By 1924, the property was used as a landing strip for planes used by the USCG for coastal patrols. In 1941, the airfield was expanded, and the property was used as a training base for Navy carrier pilots. The USCG also utilized the property for coastal patrol, anti-submarine warfare, air/sea rescue, and buoy service beginning in 1946. TRACENCM was established in 1948, and is comprised of housing, offices, clinics, a chapel, shops, and a child development center (engineering-environmental Management, Inc., 2003). The USCG, part of the Department of Homeland Security, is the owner of record for the property.

AOC 1, Abandoned Dumping Station was identified as an area where historical dumping may have occurred during the 1940s based on interviews with former base employees who stated that the area may have been a dumping ground for waste generated on base (USACE, 1994a). An initial site assessment in 1998 observed surface debris and confirmed the presence of contaminants of potential concern in samples of soil and sediment (USACE, 1998). An additional site assessment completed in 2019, included sampling of soil, sediment, and groundwater (USACE, 2019). These site assessments found no specific details regarding potential waste disposal history at AOC 1, Abandoned Dumping Station.

Following the 2019 assessment (USACE, 2019), a Remedial Investigation was completed. The purpose of the Remedial Investigation at AOC 1, Abandoned Dumping Station was to define the nature and extent, as well as associated potential risks to human health and the environment, from potential contamination related to past DoD activities at AOC 1, Abandoned Dumping Station.

The Remedial Investigation (USACE, 2025) also addressed four data gaps related to HTRW identified in the 2019 site assessment report (USACE, 2019), including:

- *Characterization of Potential Buried Waste:* A geophysical survey was completed to identify any unknown buried waste onshore and the now eroded offshore areas (Colliers Engineering & Design Project No. 19001351B, 2022). The results of the geophysical surveys recommended investigations of anomalies identified (Figure 2) to guide further investigation to determine the nature and extent of the onshore and offshore subsurface waste, if any. As discussed below, soil and sediment sampling were completed and results did not indicate a spill area or identify a source for cleanup.
- *Soil and Sediment Sampling:* Based on the concentrations of data collected in 1997, the contaminants of potential concern (COPCs) include metals, pesticides, semi-volatile organic compounds, and explosives (USACE, 1998). Additional soil (surface and subsurface) and sediment sampling was completed during the Remedial Investigation to confirm whether COPCs previously detected were still present in soil and sediment (Figure 3). While COPC were present, results were below Project Action Limits and did not indicate a spill area or identify a source for cleanup.
- *Monitoring Wells:* Five groundwater monitoring wells were installed to collect samples of groundwater (see Figure 3). Metals were the only COPCs analyte group that had detections above human health and ecological Project Action Limits in groundwater. Results were attributed to the brackish environment and did not indicate a spill.
- *Background Sampling:* A background study for soil, sediment, and groundwater was completed, but the results were not sufficient for use in the Remedial Investigation. The Site is heavily developed, was historically utilized as an airfield, and is surrounded by an ocean channel, surface impoundments, and a jetty, so it was a challenge to find true background locations. The results of the background sampling program were similar to Site results with respect to exceedances of screening levels, and therefore, could not be considered "background." Thus, a site-specific background data set was not developed as part of the RI. However, New Jersey generic background was considered in the ecological risk assessment.

The Remedial Investigation (USACE, 2025) results indicate that there was no physical evidence of a release. The geophysical survey did not identify any drums, tanks or similar vessels that may have contained hazardous materials. The chemical data similarly do not indicate a spill area. There was no HTRW debris identified. No remedial actions or removal actions have been completed by the USACE at AOC 1, Abandoned Dumping Station.

2.3 Community Participation

The scope of community participation activities performed was consistent with the United States Environmental Protection Agency (USEPA) CERCLA guidance for community involvement (USEPA, 2020), Section 300 of the NCP, and USACE guidance Engineer Pamphlet 200-3-1 (USACE, 2011). The USACE provides information to the public regarding the ongoing environmental programs at the Naval Air Station - Cape May through public meetings, publishing and distributing fact sheets, regulator meetings and communications, public information repositories (online and at a public location near the site), and the Administrative

Record. **Tables 2-1** and **2-2** describe components of these activities and documentation of how each component was satisfied for the Proposed Plan.

Table 2-1: Public Notification of Document Availability

Requirement	Satisfied By
Notice of the availability of the Proposed Plan must be made in a general-circulation major local newspaper. [NCP, 40 CFR 300.430(f)(3)(i)(A)]	Notice of availability was published in the <i>Cape May County Herald</i> on 2 July 2025 and 16 July 2025, and is included for reference in Appendix B .
Notice of the availability must include a brief abstract of the Proposed Plan, which describes the alternatives evaluated and identifies the preferred alternative [NCP, 40 CFR § 300.430(f)(3)(i)(A)].	The notice of availability encompassed the required components and is included for reference in Appendix B .

Table 2-2: Public Comment Period Requirements

Requirement	Satisfied By
The lead agency should make the document available to the public for review.	The Proposed Plan was made available to the public on 7 July 2025.
The lead agency must ensure that all information that forms the basis for selecting the response action is included as part of the Administrative Record file made available to the public during the RI, FS and public comment period. [NCP, 40 CFR 300.430(f)(3)(i)(B) and 300.815(a),(b)]	The USACE maintains the Administrative Record file at USACE New England District, 696 Virginia Road, Concord, Massachusetts 01742. A copy of relevant documents is maintained at the Cape May County Library and online at https://www.nae.usace.army.mil/missions/projects-topics/former-naval-air-station-cape-may-fuds/ .
CERCLA Section 117(a)(2) requires the lead agency to provide the public with a reasonable opportunity to submit written and oral comments on the Proposed Plan. NCP, 40 CFR 300.430(f)(3)(i)(C) requires the lead agency to allow the public a minimum of 30 days to comment on the Proposed Plan and other supporting information located in the Administrative Record.	The USACE provided a public comment period for the Proposed Plan and other supporting information from 7 July 2025 to 6 August 2025.
The lead agency must extend the public comment period by at least 30 additional days upon timely request.	The USACE was notified by NJDEP that a comment letter was forthcoming beyond the public comment deadline; the letter was received on 8 August 2025.
The lead agency must provide the opportunity for a public meeting to be held at or near the subject site during the public comment period.	A Public Meeting was held on 21 July 2025. A transcript from the meeting is provided in Appendix C .
The lead agency should solicit community input on reasonably anticipated future land use and potential beneficial uses at the site.	The notice of availability solicited this information and is included for reference in Appendix B .

2.4 Scope and Role of Response Action

This ROD presents the selected decision of No Further Action for AOC 1, Abandoned Dumping Station at NAS – Cape May in Cape May, NJ.

2.5 Project Characteristics

AOC 1, Abandoned Dumping Station is located along the Cape May Inlet, approximately 750 feet due east of Arcus Road. The AOC 1 boundary was established in the FUDS Inventory Project Report (USACE, 1994a) based on interviews with former base employees who stated that the area may have been a dumping ground for waste generated on base. As shown in **Figure 1**, AOC 1, Abandoned Dumping Station is currently bound to the west by a dirt access road and beyond that by surface impoundments made of earthen berms to contain dredge spoils for dewatering from periodic dredging of the Cape May Inlet. The property is currently bound to the north by Cape May Harbor and east by the Cape May Inlet. The southern end of the property is adjacent to the Cape May jetty and the Atlantic Ocean. Much of the estimated footprint of AOC 1, Abandoned Dumping Station is now underwater, due to over 100 feet of shoreline erosion since 1931 (USACE, 2019).

Aerial photographs from 1920, 1933, 1956, 1987 and 2012 were reviewed for evidence of historical dumping, such as the presence of drums and tanks (see Appendix A of *Remedial Investigation Report*; USACE, 2025). The review of the historical aerials did not show evidence of dumping from 1920 and 1933, but it did show several piers with a boathouse or similar structure in the vicinity of AOC 1, Abandoned Dumping Station, prior to the jetty construction. In the 1956 aerial photograph, the structure of the piers has either collapsed, been partially removed or damaged by a storm. Remnants of the piers are visible in the sand in the 1987 and 2012 aerial photographs as well. These piers are in the vicinity of concrete and metal debris visible in the vicinity of AOC 1, Abandoned Dumping Station, as well as mapped geophysical anomalies identified (**Figure 2**).

Potential contaminant sources were assessed throughout the Remedial Investigation process. Historical aerial photographs from 1920, 1933, 1956, 1987 and 2012 were reviewed, and there is evidence of a pier or system of piers in the 1920 and 1933 photographs (see Appendix A of *Remedial Investigation Report* [USACE, 2025]). The piers appeared to have fallen into disrepair in the 1956 photograph. The location of these piers and the locations of the ferrous anomalies were mapped by the geophysical surveys conducted in 2019 and 2021 (see Appendix K of *Remedial Investigation Report* [USACE, 2025]). Proposed investigation areas from the surveys are shown on **Figure 2**; these areas were further assessed through completion of test pits, soil, and sediment sampling. The amount of erosion from the shoreline of AOC 1, Abandoned Dumping Station (**Figure 3**), evident from review of aerial photographs, makes confirmation of historical dumping activities or any remaining waste material difficult.

The Remedial Investigation (USACE, 2025) results indicate that there was no physical evidence of a release. The geophysical survey did not identify any drums, tanks or similar vessels that may have contained hazardous materials. The chemical data similarly do not indicate a spill area. There was no HTRW debris identified.

Potential primary contaminant migration pathways for AOC 1, Abandoned Dumping Station would be related to sediment and soil impacts from buried debris, whose contents may have dissolved and/or desorbed into surface water and groundwater. Potential secondary release mechanisms could include wind dispersion, infiltration, erosion, and tidal dispersion.

2.6 Current and Potential Future Land and Water Uses

AOC 1, Abandoned Dumping Station is located on a secure USCG Station with no public access. Current land use is limited to intermittent recreational use. There is no potential for either current or future residential or industrial land use, because construction of buildings is not feasible at this location along the shoreline within the intertidal zone and within the area commonly inundated during king tides and storm surges. Limited construction is possible for shore stabilization or other maintenance projects in the future.

There is no current potable water use at the site, and none is reasonably anticipated in the future given that there is no potential for future residential or industrial land use.

2.7 Summary of Project Risks

The Human Health Risk Assessment and Ecological Risk Assessment conducted as part of the Remedial Investigation (USACE, 2025) demonstrated that DoD-related contaminants are not present in soil, sediment, or groundwater at concentrations that could pose an unacceptable risk to human health and the environment under its current and anticipated future land use. Future development is not feasible due to the AOC being within the intertidal zone and within the area commonly inundated during king tides and storm surges. Therefore, there is no potential for either current or future residential or industrial land use.

With respect to ecological receptors, the use of the area for foraging and nesting is greatly limited by its small size, and the site-related impact from contaminants of potential ecological concern (COPECs) in soil, sediment, and groundwater attributed to historic DoD-related activities is not significant.

The conclusions of the risk assessments support a decision of no further action at AOC 1, Abandoned Dumping Station and are summarized below.

Human Health - The human receptors potentially exposed to COPCs in soil or sediment at AOC 1 include recreational users, trespassers, or construction workers. All estimated cancer risks were within USEPA acceptable site-specific incremental cancer risk range (1E-06 to 1E-04), and the site-specific noncancer hazard index was below the USEPA target hazard index of 1 for all constituents. Additionally, lead concentrations were below established levels for recreational use of AOC 1, Abandoned Dumping Station. Therefore, there are no carcinogenic or noncarcinogenic human health COPCs associated with AOC 1, Abandoned Dumping Station, and AOC 1, Abandoned Dumping Station is acceptable for its ongoing recreational use.

Ecological - The potential impacts to ecological receptors from COPECs potentially attributed to historical DoD-related activities are insignificant. Following a 2-phase Screening Level Ecological Risk Assessment, the following chemicals were retained as COPECs in separate media:

- Surface soil – lead, vanadium, and dichlorodiphenyldichloroethane
- Subsurface soil – none

- Sediment - dichlorodiphenyl trichloroethane, dichlorodiphenyl dichloroethylene, lead, and zinc
- Groundwater discharge to surface water - none

The COPEC refinement presents more than one line of evidence to support decision making. While historical dumping may have occurred at AOC 1, Abandoned Dumping Station, metals and pesticides may also be present due to natural and anthropogenic sources. Metals, pesticides, and polycyclic aromatic hydrocarbons in soil were compared to mean background concentrations for New Jersey provided by the NJDEP and were found to be less in site soil. Concentrations of pesticides in sediment were sporadic and consistent with historical use for mosquito control across the United States. Lead concentrations in sediment were compared to revised avian lead ecological screening levels based on a re-evaluation of toxicity data and relative bioavailability. The hazard quotients were equal to the threshold consideration of 1.0 only for the likely most exposed species (avian insectivore [American woodcock]). The low effect hazard quotient for zinc (1.9) exceeds 1.0 only for the avian insectivore (American robin). However, the food chain exposure of a wading bird within AOC 1, Abandoned Dumping Station would be limited because it provides limited 0.5-acre vegetated upland and narrow beach habitat. For example, the area use factor for the piping plover, a federally listed species, is 0.1 (0.5 acre/5-acre home range). While wading birds may forage within sediments of AOC 1, Abandoned Dumping Station, the site is not critical foraging habitat or critical nesting habitat.

The use of the AOC 1, Abandoned Dumping Station area for foraging and nesting is limited by its small size. Due to ocean proximity, tidal intrusion, and the decades since historical DoD-related dumping activities occurred, it is unlikely that any potential impacts to surface water are attributable to former DoD-related activities. While pesticides were identified as COPECs, remedial activities under CERCLA are not required for pesticides and herbicides applied per their intended use. Lead and vanadium concentrations in soil were representative of State of New Jersey background concentrations. Despite using conservative assumptions (i.e., conservative screening values, default exposure assumptions, assumptions of exposure to non-DoD related sources of metals, pesticides and polycyclic aromatic hydrocarbons), the ecological risk assessment concluded that the AOC 1, Abandoned Dumping Station does not pose unacceptable risks to ecological receptors exposed to soil, sediment, and groundwater discharging to surface water.

2.8 Remedial Action Objectives

The Remedial Investigation (USACE, 2025) is complete, and additional investigation or remedial actions are not required because the nature and extent of contamination has been defined and the risk assessments indicate that there are no unacceptable risks to human health or the environment. Based on these results, implementing a risk-based remedial action, which would include selecting Remedial Action Objectives (RAOs), and developing a Feasibility Study are not required. Therefore, the project has proceeded to the preparation of ROD for No Further Action.

PART 3: RESPONSIVENESS SUMMARY

This section provides a summary of the public comments regarding the preferred alternative presented in the Proposed Plan and the USACE response to those comments. At the time of the public review period, the preferred alternative was No Further Action. No change to the preferred alternative was made as a result of the public comment period.

3.1 Overview

The public comment period extended from July 7, 2025 through August 6, 2025. At the request of NJDEP, the public comment period was extended an additional 30 days for their opportunity to submit comments. Notice of the public comment period and meeting was published in the Cape May County Herald on 2 July 2025 and 16 July 2025. The Proposed Plan was released for public comment on 7 July 2025 and was available for review at <https://www.nae.usace.army.mil/missions/projects-topics/former-naval-air-station-cape-may-fuds/> and at Cape May Public Library. **Appendix B** contains a copy of the published notice. A Public Meeting was held on July 21, 2025. A transcript of the Public Meeting is provided as **Appendix C**. A representative from the state regulatory agency (NJDEP) attended the Public Meeting and made verbal comments. Those comments were subsequently formalized in a comment letter provided in **Appendix A**. No other comments were received during the public comment period or during the Public Meeting.

3.2 Stakeholder Comments and Lead Agency Responses

NJDEP comments were provided at the Public Meeting and via letter on August 8, 2025 to document its non-concurrence with the decision of No Further Action. NJDEP comments and USACE responses are provided below.

NJDEP Comment 1: The presence of pesticides, metals, and polycyclic aromatic hydrocarbons above the New Jersey residential soil remediation standard for the ingestion-dermal exposure pathway requires an institutional control in the form of a federal facilities land use control or Base Master Plan advisory. A Remedial Action Permit is required if the property is transferred from the Coast Guard to a private party.

Response: The USACE executes the FUDS-DERP in accordance with CERCLA, the DERP statute, and the National Oil and Hazardous Substances Pollution Contingency Plan. If the USACE determines prior to the Feasibility Study (FS) that AOC-1 does not pose unacceptable risk to human health, safety, or the environment, the USACE is not required to complete an FS or a response action and shall not evaluate Applicable or Relevant and Appropriate Requirements (ARARs) pursuant to 42 USC § 9621(d)(2)(A) of CERCLA. Because there is no unacceptable risk at AOC-1, ARARs, such as the New Jersey soil remediation standard, will not be considered or evaluated.

Furthermore, only the federal land manager (i.e., the United States Coast Guard (USCG)) has agency to prepare a land use control or modify the Base Master Plan (i.e., not the USACE).

NJDEP Comment 2: The Ecological Risk Assessment was not conducted according to the Department's technical guidance. Pesticides in particular exceed the medium effects range for saline water environments.

Response: See Response to Comment # 1.

NJDEP Comment 3: The Department requires pesticides to be addressed in accordance with the Historically Applied Pesticide Technical Guidance.

Response: See Response to Comment # 1.

The NJDEP comment letter and USACE response are provided as **Appendix A**.

3.3 Technical and Legal Issues

No technical or legal issues regarding the Proposed Plan were identified during the public meeting and/or public comment period. This ROD will be added to the Administrative Record file after it is signed. In addition, a notice of the availability of the ROD will be published in the Cape May County Herald in accordance with the NCP at 40 CFR Section 300.430(f)(6).

PART 4 REFERENCES

Colliers Engineering & Design Project No. 19001351B. 2022. *Phase II Geophysical Evaluation, Report: Expanded Survey of the Former NAS Cape May Defense Site Abandoned Dumping Station*, June 2022.

engineering-environmental Management, Inc. 2003. *Integrated Natural Resources Management Plan and Environmental Assessment, USGC Training Center, Cape May, New Jersey*. Prepared for USCG Training Center, Cape May, NJ and USCG Headquarters, Washington, DC.

U.S. Army Corps of Engineers (USACE), 1994a. Memorandum for Commander: Baltimore District, ATTN: CENAB-EN-HN, Subject: DERP-FUDS Inventory Project Report (INPR) for Site No. C02NJ0951, Naval Air Station, Cape May, New Jersey.

USACE, 1994b. Risk Assessment Procedures for Ordnance and Explosive Waste Sites, Naval Air Station, Cape May, New Jersey.

USACE, 1998. Final Report: *Data Collection at Defense Environmental Restoration Program – Formerly Used Defense Sites (DERP-FUDS) Naval Air Station Cape May, Cape May, New Jersey*. Prepared by Ogden Environmental and Energy Services Co., Inc. for Northern Ecological Associates, Inc., under contract with the USACE New York District. DERP-FUDS Site No. C02NJ0951. Contract No. DACW51-97-D-0010, Delivery Order 0008.

USACE, 2004a. Environmental Quality - Formerly Used Defense Sites (FUDS). ER 200-3-1. U.S. Army Corps of Engineers.

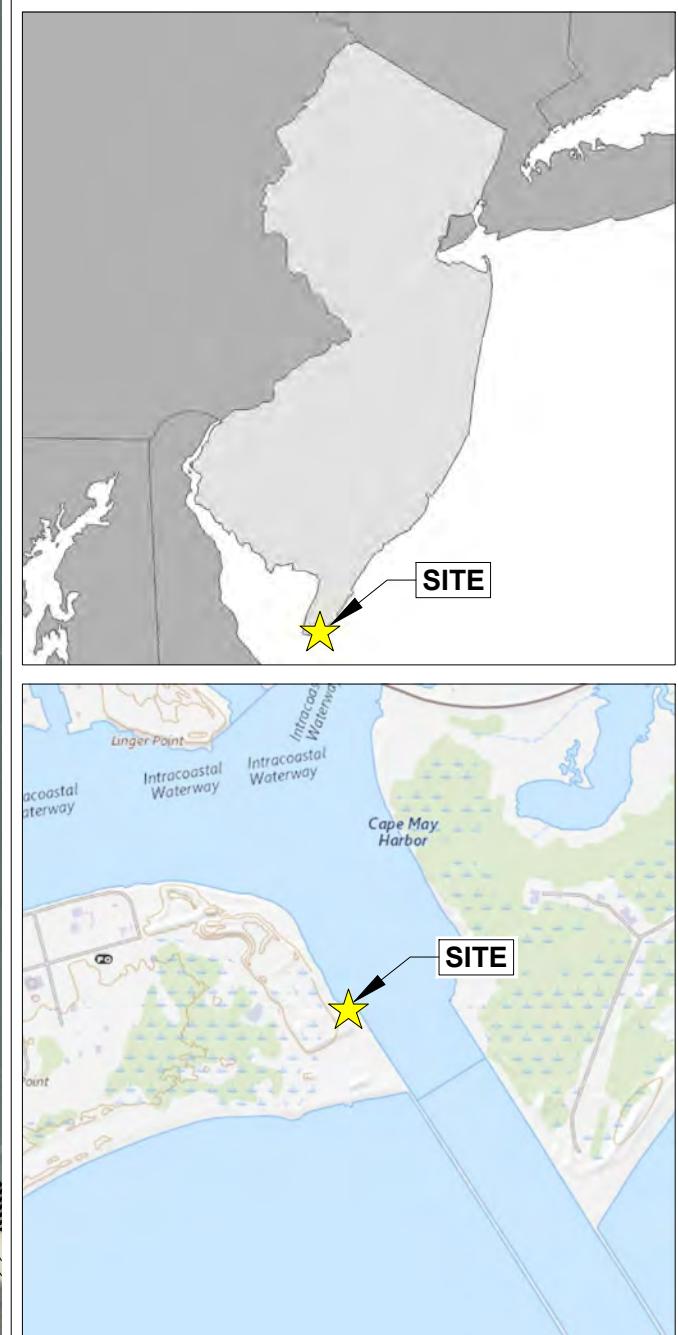
USACE, 2004b. Public Participation in the Defense Environmental Restoration Program (DERP) for Formerly Used Defense Sites (FUDS). Engineer Pamphlet (EP) 200-3-1. U.S. Army Corps of Engineers.

USACE, 2019. *Expanded Technical Memorandum, Former Naval Air Station (NAS), Cape May, New Jersey, Formerly Used Defense Site (FUDS) Project Number C02NJ095101*. Prepared by Bluestone Environmental Group, Inc. February 2019.

USACE, 2025. *Remedial Investigation Report for AOC 1, Abandoned Dumping Station, Former Naval Air Station, Cape May, New Jersey FUDS Project Number C02NJ095101*. Prepared by Sovereign Consulting Inc. FINAL. March 2025.

USEPA. 2020. *Superfund Community Involvement Handbook*. March.

FIGURES



FORMER NAVAL AIR STATION
BLOCK 1218, LOT 2
CAPE MAY, CAPE MAY COUNTY, NEW JERSEY

SITE LOCATION MAP

	SOVEREIGN CONSULTING INC. Figure: 4 Open Square Way, Suite 307 Holyoke, NJ 01040 Ph:(413) 540-0650 Fax:(413) 540-0656 www.sovcon.com	1
	CREATED BY : PM DATE: 03/25/2021	REVISED BY : PM DATE: 2/21/2025



LEGEND:

- Geophysical (original) Area
- Geophysical (expanded) Area
- Target Area Recommended for Exploration

FORMER NAVAL AIR STATION
BLOCK 1218, LOT 2
CAPE MAY, CAPE MAY COUNTY, NEW JERSEY

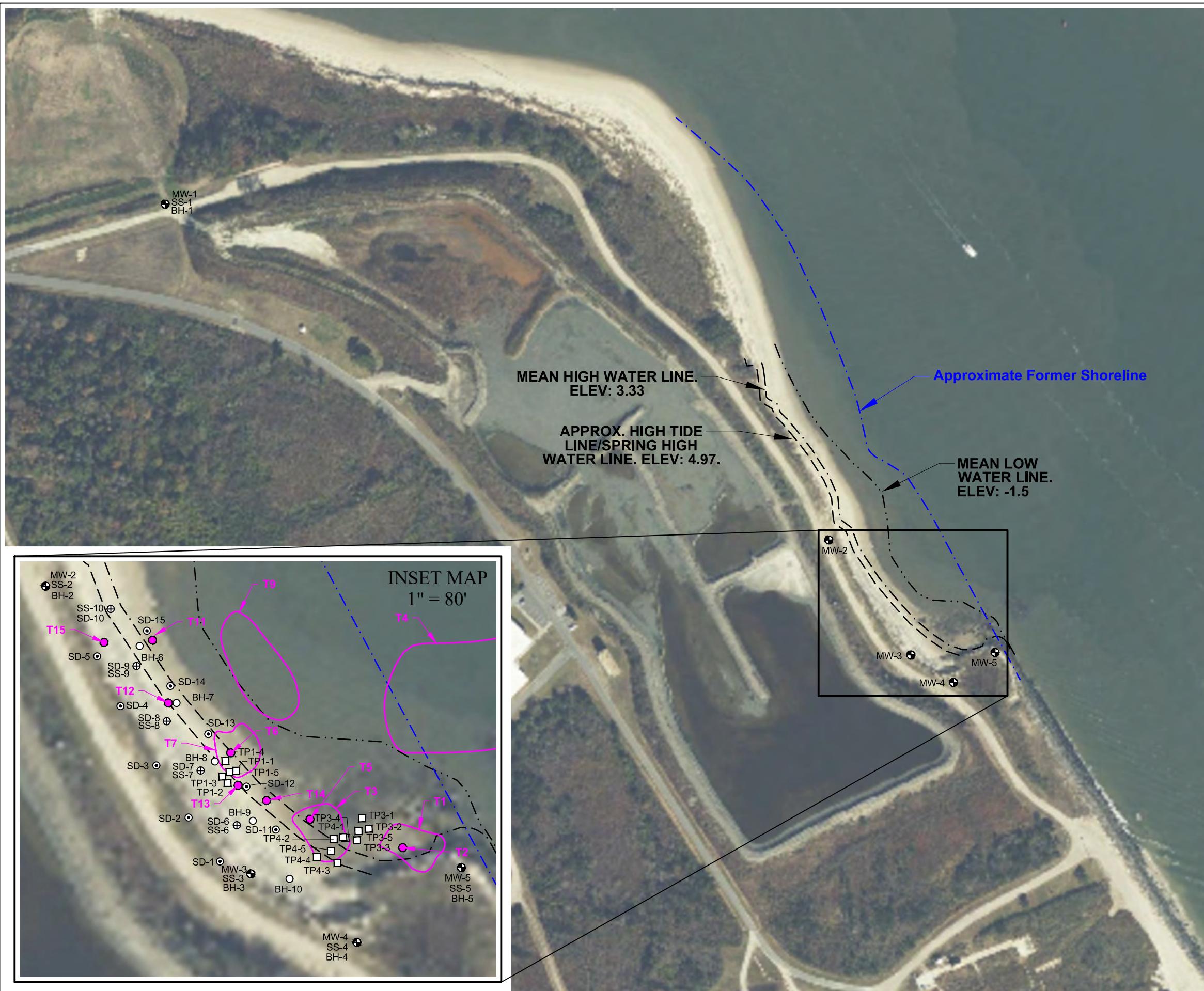
GEOPHYSICAL ANOMALIES AND
PROPOSED INVESTIGATION AREAS

SOVEREIGN CONSULTING INC. | Figure:
4 Open Square Way, Suite 307
Holyoke, NJ 01040
Ph:(413) 540-0650 Fax:(413) 540-0656
www.sovcon.com

2

CREATED BY : PM
DATE: 03/25/2021

REVISED BY : PM
DATE: 3/7/2025



APPENDIX A

New Jersey Department of Environmental Protection Comment Letter and Response



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION CONTAMINATED SITE REMEDIATION & REDEVELOPMENT DIVISION OF REMEDIATION MANAGEMENT

PHILIP D. MURPHY
Governor

TAHESHA L. WAY
Lt. Governor

401 East State Street
P.O. Box 420, Mail Code 401-05M
Trenton, New Jersey 08625-0420
Tel. (609) 292-1251
www.nj.gov/dep

SHAWN M. LATOURETTE
Commissioner

Heather Sullivan, PMP
FUDS Program Manager
US Army Corps of Engineers
696 Virginia Road
Concord, MA 01742

August 8, 2025

RE: Proposed Plan - Former Cape May Naval Air Station
Area of Concern 1: Abandoned Dumping Station
Cape May, New Jersey

Dear Ms. Sullivan:

The New Jersey Department of Environmental Protection (Department) has completed a review of the Proposed Plan for Area of Concern 1 (AOC 1) at the Cape May Former Naval Air Station dated June 2025. The Proposed Plan was prepared by the United States Army Corps of Engineers (USACE) and submitted pursuant to the Defense and State Memorandum of Agreement (DSMOA) executed on April 3, 1992.

The USACE proposes no further action (NFA) for AOC 1, stating that there are no unacceptable risks from CERCLA hazardous substances and there is no evidence of a historic release. The USACE does not utilize New Jersey promulgated remediation standards as a trigger for remedial action. Instead, they use a CERCLA compliant Human Health Risk Assessment and Ecological Risk Assessment to determine if there is risk to support the need for any remedial action.

The Department cannot concur on the Proposed Plan for the following reasons:

1. The presence of pesticides, metals, and polycyclic aromatic hydrocarbons (PAHs) above the New Jersey residential soil remediation standard for the ingestion-dermal exposure pathway requires an institutional control in the form of a federal facilities land use control or Base Master Plan advisory. A Remedial Action Permit is required if the property is transferred from the Coast Guard to a private party.
2. The Ecological Risk Assessment was not conducted according to the Department's technical guidance. Pesticides in particular exceed the medium effects range for saline

water environments.

3. The Department requires pesticides to be addressed in accordance with the Historically Applied Pesticide Technical Guidance.

For these reasons, the Department cannot concur with the no further action proposal for AOC 1. If you have any questions, please contact Anthony Cinque, Chief, Bureau of Case Management at 609-940-4502 or Anthony.Cinque@dep.nj.gov.

Sincerely,



Gwen B. Zervas, P.E.
Director





**DEPARTMENT OF THE ARMY
US ARMY CORPS OF ENGINEERS
NEW ENGLAND DISTRICT
696 VIRGINIA ROAD
CONCORD MA 01742-2751**

CENAE-PPE

August 12, 2025

Gwen B. Zervas, P.E., Director
New Jersey Department of Environmental Protection
Division of Remediation Management
401 East State Street
Trenton, New Jersey 08625-0420

**SUBJECT: NJDEP Comments on the Proposed Plan
Former Naval Air Station Cape May, AOC 1: Abandoned Dumping Station
FUDS Site Number C02NJ0951, Cape May County, New Jersey**

Dear Ms. Zervas:

The U.S. Army Corps of Engineers (USACE) is pleased to provide the enclosed responses to the New Jersey Department of Environmental Protection (NJDEP) comments on the Proposed Plan for the subject project.

The Proposed Plan was submitted to the NJDEP for review on June 17, 2025. Comments were received from the NJDEP in a letter dated August 8, 2025. All comments will be recorded in the Record of Decision.

As acknowledged in the NJDEP's letter, the Formerly Used Defense Site (FUDS) Defense Environmental Restoration Program (DERP) is required to follow the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). A CERCLA-compliant Human Health Risk Assessment and Ecological Risk Assessment determined there is no unacceptable risk to support the need for remedial action, thus resulting in the selection of No Further Action.

As a courtesy to the NJDEP, the USACE will refer these comments to the federal land manager (i.e., the United States Coast Guard).

Please feel free to contact me with any questions at heather.l.sullivan@usace.army.mil or (978) 318-8543.

Sincerely,

**SULLIVAN.HEATH
ER.L.1228495065**

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Heather L. Sullivan
FUDS Program Manager

Enclosure

USACE Response to NJDEP Comments on the Proposed Plan
Former Naval Air Station Cape May, AOC 1: Abandoned Dumping Station
FUDS Site Number C02NJ0951,
Cape May County, New Jersey
August 2025

NJDEP Comments Dated August 8, 2025

1. The presence of pesticides, metals, and polycyclic aromatic hydrocarbons (PAHs) above the New Jersey residential soil remediation standard for the ingestion-dermal exposure pathway requires an institutional control in the form of a federal facilities land use control or Base Master Plan advisory. A Remedial Action Permit is required if the property is transferred from the Coast Guard to a private party.

USACE Response:

The USACE executes the FUDS-DERP in accordance with CERCLA, the DERP statute, and the National Oil and Hazardous Substances Pollution Contingency Plan. If the USACE determines prior to the Feasibility Study (FS) that AOC-1 does not pose unacceptable risk to human health, safety, or the environment, the USACE is not required to complete an FS or a response action and shall not evaluate Applicable or Relevant and Appropriate Requirements (ARARs) pursuant to 42 USC § 9621(d)(2)(A) of CERCLA. Because there is no unacceptable risk at AOC-1, ARARs, such as the New Jersey soil remediation standard, will not be considered or evaluated.

Furthermore, only the federal land manager (i.e., the United States Coast Guard (USCG)) has agency to prepare a land use control or modify the Base Master Plan (i.e., not the USACE).

2. The Ecological Risk Assessment was not conducted according to the Department's technical guidance. Pesticides in particular exceed the medium effects range for saline water environments.

USACE Response:

See Response to Comment # 1.

3. The Department requires pesticides to be addressed in accordance with the Historically Applied Pesticide Technical Guidance.

USACE Response:

See Response to Comment # 1.



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION CONTAMINATED SITE REMEDIATION & REDEVELOPMENT DIVISION OF REMEDIATION MANAGEMENT

PHILIP D. MURPHY
Governor

TAHESHA L. WAY
Lt. Governor

401 East State Street
P.O. Box 420, Mail Code 401-05M
Trenton, New Jersey 08625-0420
Tel. (609) 292-1251
www.nj.gov/dep

SHAWN M. LATOURETTE
Commissioner

Heather Sullivan, PMP
FUDS Program Manager
US Army Corps of Engineers
696 Virginia Road
Concord, MA 01742

November 13, 2025

RE: Record of Decision - Former Cape May Naval Air Station
Area of Concern 1: Abandoned Dumping Station
Cape May, New Jersey

Dear Ms. Sullivan:

The New Jersey Department of Environmental Protection (Department) has completed a review of the Record of Decision (ROD) for Area of Concern 1 (AOC 1) at the Cape May Former Naval Air Station submitted September 2025. The ROD was prepared by the United States Army Corps of Engineers (USACE) and submitted pursuant to the Defense and State Memorandum of Agreement (DSMOA) executed on April 3, 1992.

The ROD selects no further action (NFA) for AOC 1, stating that there are no unacceptable risks from CERCLA hazardous substances and there is no evidence of a historic release. The USACE does not utilize New Jersey promulgated remediation standards as a trigger for remedial action. Instead, they use a CERCLA compliant Human Health Risk Assessment and Ecological Risk Assessment to determine if there is risk to support the need for any remedial action.

The Department cannot concur with the ROD for the following reasons:

1. The presence of pesticides, metals, and polycyclic aromatic hydrocarbons (PAHs) above the New Jersey residential soil remediation standard for the ingestion-dermal exposure pathway requires an institutional control in the form of a federal facilities land use control or Base Master Plan advisory. A Remedial Action Permit is required if the property is transferred from the Coast Guard to a private party.
2. The Ecological Risk Assessment was not conducted according to the Department's technical guidance. Pesticides in particular exceed the medium effects range for saline

water environments.

3. The Department requires pesticides to be addressed in accordance with the Historically Applied Pesticide Technical Guidance.

For these reasons the Department cannot concur with the no further action proposal for AOC 1. If you have any questions, please contact Anthony Cinque, Chief, Bureau of Case Management at 609-940-4502 or Anthony.Cinque@dep.nj.gov.

Sincerely,



Gwen B. Zervas, P.E.
Director





DEPARTMENT OF THE ARMY
US ARMY CORPS OF ENGINEERS
NEW ENGLAND DISTRICT
696 VIRGINIA ROAD
CONCORD MA 01742-2751

CENAE-PPE

November 14, 2025

Gwen B. Zervas, P.E., Director
New Jersey Department of Environmental Protection
Division of Remediation Management
401 East State Street
Trenton, New Jersey 08625-0420

SUBJECT: NJDEP Comments on the Record of Decision
Former Naval Air Station Cape May, AOC 1: Abandoned Dumping Station
FUDS Site Number C02NJ0951, Cape May County, New Jersey

Dear Ms. Zervas:

The U.S. Army Corps of Engineers (USACE) is pleased to provide the enclosed responses to the New Jersey Department of Environmental Protection (NJDEP) comments on the Record of Decision for the subject project.

The Draft Record of Decision was submitted to the NJDEP for review on September 22, 2025. Comments were received from the NJDEP in a letter dated November 13, 2025.

As acknowledged in the NJDEP's letter, the Formerly Used Defense Site (FUDS) Defense Environmental Restoration Program (DERP) is required to follow the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). A CERCLA-compliant Human Health Risk Assessment and Ecological Risk Assessment determined there is no unacceptable risk to support the need for remedial action, thus resulting in the selection of No Further Action.

The NJDEP's comments will be recorded in the Record of Decision and a final version will be provided to NJDEP and archived in the Administrative Record.

Please feel free to contact me with any questions at heather.l.sullivan@usace.army.mil or (978) 318-8543.

Sincerely,
SULLIVAN.HEA
THER.L.122849
5065
Heather L. Sullivan
FUDS Program Manager

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Enclosure

USACE Response to NJDEP Comments on the Record of Decision
Former Naval Air Station Cape May, AOC 1: Abandoned Dumping Station
FUDS Site Number C02NJ0951,
Cape May County, New Jersey
November 2025

NJDEP Comments Dated November 13, 2025

1. The presence of pesticides, metals, and polycyclic aromatic hydrocarbons (PAHs) above the New Jersey residential soil remediation standard for the ingestion-dermal exposure pathway requires an institutional control in the form of a federal facilities land use control or Base Master Plan advisory. A Remedial Action Permit is required if the property is transferred from the Coast Guard to a private party.

USACE Response:

The USACE executes the FUDS-DERP in accordance with CERCLA, the DERP statute, and the National Oil and Hazardous Substances Pollution Contingency Plan. If the USACE determines prior to the Feasibility Study (FS) that AOC-1 does not pose unacceptable risk to human health, safety, or the environment, the USACE is not required to complete an FS or a response action and shall not evaluate Applicable or Relevant and Appropriate Requirements (ARARs) pursuant to 42 USC § 9621(d)(2)(A) of CERCLA. Because there is no unacceptable risk at AOC-1, ARARs, such as the New Jersey soil remediation standard, will not be considered or evaluated.

Furthermore, only the federal land manager (i.e., the United States Coast Guard (USCG)) has agency to prepare a land use control or modify the Base Master Plan (i.e., not the USACE).

2. The Ecological Risk Assessment was not conducted according to the Department's technical guidance. Pesticides in particular exceed the medium effects range for saline water environments.

USACE Response:

See Response to Comment # 1.

3. The Department requires pesticides to be addressed in accordance with the Historically Applied Pesticide Technical Guidance.

USACE Response:

See Response to Comment # 1.

APPENDIX B

Public Notice from Cape May County Herald

Affidavit of Publication

STATE OF NEW JERSEY } SS
COUNTY OF CAPE MAY }

Ad Cost: \$72.30

Molly Richard, being first duly sworn, says:

That she is the Clerk of the the Cape May County Herald Times, a weekly newspaper of general circulation, printed and published in Rio Grande, Cape May County, New Jersey; that the publication, a copy of which is attached hereto, was published in said newspaper on the following dates:

July 2, 2025

That said newspaper was regularly issued and circulated on those dates.

SIGNED:

Clerk



Subscribed to and sworn to me this 2nd day of July 2025.



Patrice J Bechta, Notary Public, Cape May County New Jersey
ID# 0050204541

PATRICE J BECHTA NOTARY PUBLIC STATE OF NEW JERSEY ID # 50204541 COMMISSION EXPIRES NOV. 15, 2027

Jorge Montoy
Sovereign Consulting Inc.
111-A North Gold Drive
Trenton, NJ 08691

**U.S. ARMY CORPS OF ENGINEERS INVITES PUBLIC COMMENT ON THE
PROPOSED PLAN FOR AREA OF CONCERN 1 AT THE FORMER CAPE MAY
NAVAL AIR STATION,
CAPE MAY, NEW JERSEY**

Proposed Plan

The U.S. Army Corps of Engineers prepared a Proposed Plan identifying the preferred alternative to remediate AOC 1 Abandoned Dumping Station at the former Naval Air Station in Cape May, New Jersey. AOC 1 is an approximately one-acre sized area of shoreline located on U.S Coast Guard Training Center Cape May (TRACENCM), which was formerly Naval Air Station Cape May. TRACENCM is a secure USCG facility with no public access. AOC 1 was identified for environmental investigation under the Defense Environmental Restoration Program as Formerly Used Defense Site Project No. C02NJ095101 because historical dumping may have occurred from a former pier between the 1920s and 1940s potentially resulting in impacts to the environment.

In accordance with the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), an investigation of AOC 1 was completed that included aerial geophysical surveying, test pitting, and laboratory testing of sediment, soil, and groundwater. The investigation found no physical evidence that a spill occurred and concluded there is no unacceptable risk from hazardous substances from former Navy operations at AOC 1. Therefore, a remedial action for AOC 1 under CERCLA is not required, and the preferred alternative is No Further Action.

The Proposed Plan for AOC 1 at the Former Cape May Naval Air Station is available for review at <https://www.nae.usace.army.mil/missions/projects-topics/former-naval-air-station-cape-may-fuds/> and at the Cape May Public Library, 720 Franklin St, Cape May, NJ 08204.

Public Meeting

The U.S. Army Corps of Engineers invites the public to attend a meeting explaining the Proposed Plan. Oral and written comments will be accepted at the meeting.

The meeting will be held as follows:

DATE: July 21, 2025
TIME: 6:00 PM
PLACE: Cape May Convention Center – Community Room
714 Beach Ave
Cape May, NJ 08204

For more information e-mail Gregory Hencir Gregory.M.Hencir@usace.army.mil.

Written Comments

The 30-day public comment period on the proposed action extends from July 7, 2025 to August 6, 2025. Written comments, postmarked by August 6, 2025 should be sent to:

Gregory Hencir
Project Manager
USACE New England District
696 Virginia Road
Concord, MA 01742-2751
Gregory.M.Hencir@usace.army.mil
(978) 318-8873

PRICE J BECHTA
NOTARY PUBLIC
STATE OF NEW JERSEY
ID # 50204541
COMMISSION EXPIRES NOV 15, 2027

APPENDIX C

Public Meeting Transcript

U.S. ARMY CORPS OF ENGINEERS PUBLIC MEETING

Moderated by Elizabeth Goselin

Monday, July 21, 2025

6:02 p.m.

Cape May Convention Center - Community Room

714 Beach Avenue

Cape May, NJ 08204

Reported by: Samuel Haut

JOB NO: 7471777

<p>1 A P P E A R A N C E S</p> <p>2 List of Attendees:</p> <p>3 Brett Dietz, Sovereign</p> <p>4 Gregory Hencir, USACE Project Manager</p> <p>5 Heather Sullivan, USACE Program Manager</p> <p>6 Elizabeth Goselin, Chief of Public Affairs</p> <p>7 Amy Rosenstein, USACE Human Health Risk Assessor</p> <p>8 Scott Vondy, NJDEP</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	Page 2	<p>1 from USACE project manager, Greg Hencir, who will</p> <p>2 provide an overview of our efforts at the site. Next,</p> <p>3 Amy Rosenstein, a USACE human health risk assessor,</p> <p>4 will provide an overview of the risk assessments and</p> <p>5 the remedial investigation results.</p> <p>6 After each presentation, we will pause</p> <p>7 for questions. And at the end of all presentations,</p> <p>8 we will open the floor to receive public comments.</p> <p>9 If you do not wish to provide verbal</p> <p>10 comments at this time, a written statement may be</p> <p>11 filled out on the forms located here today or mailed.</p> <p>12 Please see a USACE team member for the forms.</p> <p>13 Your verbal statements and questions,</p> <p>14 along with all written statements submitted, will</p> <p>15 receive equal consideration. Comments will be</p> <p>16 received until August 6, 2025.</p> <p>17 At this time, I'd like to introduce</p> <p>18 Greg Hencir.</p> <p>19 MR. HENCIR: Thank you, Beth.</p> <p>20 So for introductions again, I'm Greg</p> <p>21 Hencir, project manager U.S. Army Corps of Engineers.</p> <p>22 Listed on the presentation slide here are -- as our</p> <p>23 project team from the Army Corps of Engineers, Heather</p> <p>24 Sullivan, program manager; myself; Amy Rosenstein, our</p> <p>25 human health risk assessor; Beth Goselin, the chief of</p>	Page 4
<p>1 P R O C E E D I N G S</p> <p>2 THE REPORTER: We are on the record at</p> <p>3 6:02 p.m.</p> <p>4 MS. GOSELIN: Good evening. I'd like</p> <p>5 to welcome you to the public meeting to present the</p> <p>6 U.S. Army Corps of Engineers' proposed plan for area</p> <p>7 of concern 1, abandoned dumping station at the former</p> <p>8 Naval Air Station in Cape May, New Jersey. This</p> <p>9 project is part of the Defense Environmental</p> <p>10 Restoration Program.</p> <p>11 My name is Beth Goselin, and I am the</p> <p>12 chief of public affairs for the U.S. Army Corps of</p> <p>13 Engineers. I will be your moderator and facilitator</p> <p>14 tonight. Before we begin, I'd like you to -- remind</p> <p>15 you to sign the sign in sheet at the door.</p> <p>16 Tonight's meeting will provide an</p> <p>17 overview of the U.S. Army Corps of Engineers or</p> <p>18 USACE's investigation and cleanup efforts and our</p> <p>19 proposed plan for the site. It will also be an</p> <p>20 opportunity for you to provide public comments on our</p> <p>21 proposed plan.</p> <p>22 Please note that this meeting is being</p> <p>23 recorded and a transcript, including the questions and</p> <p>24 answers, will be available in the public record.</p> <p>25 We'll begin tonight with a presentation</p>	Page 3	<p>1 our public affairs.</p> <p>2 And as part of the Army, we do have</p> <p>3 other resources that we reached out to for technical</p> <p>4 support. That includes the U.S. Army Environmental</p> <p>5 and Munitions Center of Expertise, as well as the U.S.</p> <p>6 Defense Centers for Public Health in Aberdeen. And</p> <p>7 then we also rely on contractors. So for this</p> <p>8 project, we were provided support from Renova-</p> <p>9 Sovereign Joint Venture.</p> <p>10 And then also, you know, to have a</p> <p>11 successful project, we also have stakeholders, and</p> <p>12 those -- that includes the regulatory agency, the New</p> <p>13 Jersey Department of Environmental Protection and the</p> <p>14 case manager from the State is Scott Vondy. And then</p> <p>15 also as a stakeholder, the property owner is the U.S.</p> <p>16 Coast Guard.</p> <p>17 So the meeting objectives is to present</p> <p>18 an overview of the remedial investigation leading to</p> <p>19 the selection of preferred alternative of no further</p> <p>20 action in the proposed plan. And we have this meeting</p> <p>21 to gather community feedback on that proposed plan,</p> <p>22 and we are here to address questions and answer any</p> <p>23 comments that you might have regarding the proposed</p> <p>24 plan or in fact anything on the regional</p> <p>25 investigations that you are curious or have questions</p>	Page 5

<p>1 about.</p> <p>2 So the agenda for this evening's</p> <p>3 meeting is a site history. Then we're going to</p> <p>4 discuss current conditions and current site uses. I'd</p> <p>5 like to talk a little bit about the federal cleanup</p> <p>6 program so that people have understanding of the</p> <p>7 framework for which the Army Corps of Engineers</p> <p>8 operates under when we do investigation and</p> <p>9 remediation.</p> <p>10 And then do a discussion of our</p> <p>11 remedial investigation, which is a comprehensive study</p> <p>12 to characterize the site. From that study becomes a</p> <p>13 proposed plan, which we're going to be talking about</p> <p>14 this evening. And then they'll be a public comment</p> <p>15 period for that proposed plan. However, throughout</p> <p>16 the presentation, there's -- there's a few question</p> <p>17 breaks so if you have questions, feel free to ask them</p> <p>18 so they don't have to wait till the very end.</p> <p>19 So first, site history and current</p> <p>20 conditions. So the U.S. Army Corps of Engineers</p> <p>21 performed a remedial investigation of area of concern,</p> <p>22 or AOC 1. You'll see from the screen that this is</p> <p>23 the -- if you're local to the area, you know that</p> <p>24 there's a Coast Guard station in Cape May. This is at</p> <p>25 the very end of the Coast Guard station along the</p>	Page 6	<p>1 So today, it contains offices. There's</p> <p>2 a chapel, shops. There's a childcare development</p> <p>3 center. And then all the buildings that would support</p> <p>4 the training of the Coast Guard cadets. And then the</p> <p>5 U.S. Coast Guard continues to use it today and is t</p> <p>6 current owner.</p> <p>7 So the aerial photos really gives a</p> <p>8 good overview of the history of area of concern 1. So</p> <p>9 the first photo is the earliest photo that we have.</p> <p>10 It's from 1931. And again, that area over kind of on</p> <p>11 the far end of the base towards the inlet. And then</p> <p>12 the bottom of the screen is -- is kind of a -- like, a</p> <p>13 zoom in of that particular area. And as you can see,</p> <p>14 in 1931, there was a -- a short pier and what looks to</p> <p>15 be a platform or a boathouse. In 1940, you can see</p> <p>16 that same feature, but the pier has been extended.</p> <p>17 It's been developed a little bit more.</p> <p>18 Now this next slide is after it was</p> <p>19 transferred to the Coast Guard. So the next photo</p> <p>20 that we have obtained -- obtained is from 1951. And</p> <p>21 as you can see, the pier and the boathouse or</p> <p>22 structure is gone.</p> <p>23 And so our running theory is that there</p> <p>24 were many storms the 1940s, and it was likely that</p> <p>25 this pier and boathouse was destroyed and then never</p>	Page 8
<p>1 inlet. You see in this screen the circle in red.</p> <p>2 That's area of concern 1. It's called abandoned</p> <p>3 dumping station. But you'll see that it is a rather</p> <p>4 small piece of property on the larger Coast Guard</p> <p>5 base. It's about one acre in size, and it's</p> <p>6 predominately consisting of the shoreline and then</p> <p>7 some of the features are also submerged.</p> <p>8 So the Coast Guard base in general has</p> <p>9 a site history that -- that dates back until the turn</p> <p>10 of the 20th century. Pre-1918, this was an amusement</p> <p>11 park. And then in 1918, it was obtained by the U.S.</p> <p>12 Navy for use as the Naval Air Station Cape May.</p> <p>13 You're going to see from aerial photos there was an</p> <p>14 airport associated with this base. They also used it</p> <p>15 as a submarine base and for training naval aviators</p> <p>16 and flight crews.</p> <p>17 The Navy used it until 1946. So just</p> <p>18 after the second World War, when it was conveyed to</p> <p>19 the U.S. Coast Guard for use as coastal patrols,</p> <p>20 anti-submarine warfare, air and sea rescue, and buoy</p> <p>21 service. Shortly thereafter, the Coast Guard</p> <p>22 transferred or switched the use of the property to be</p> <p>23 mostly focused on training. So it became U.S. Coast</p> <p>24 Guard Training Center Cape May as we know it today and</p> <p>25 that was in 1948.</p>	Page 7	<p>1 rebuilt. And in fact, in -- according to the naval</p> <p>2 records from when it was obtained to when it was</p> <p>3 conveyed to the Coast Guard, believe it or not,</p> <p>4 there -- there was a hundred acres of land loss on</p> <p>5 that peninsula that we believe was due to coastal</p> <p>6 erosion from storms.</p> <p>7 And then over this photo is a more</p> <p>8 current photo from -- aerial photo from 2012, where</p> <p>9 you'll -- you'll see that the -- the features from the</p> <p>10 sky are almost completely gone. But if you were to go</p> <p>11 to this site at low, low tide, you would see some of</p> <p>12 the remnants of the piers. This photos shows some of</p> <p>13 the wooden columns that once were the foundation of</p> <p>14 that pier. And you can also find some concrete debris</p> <p>15 and other debris that was likely associated to some</p> <p>16 structure that was -- that was in this area. And</p> <p>17 about 100 feet of shoreline has been lost in this</p> <p>18 particular spot at AOC 1 from the time that the Coast</p> <p>19 Guard obtained the land.</p> <p>20 So current conditions. The training</p> <p>21 center is a U.S. Coast Guard facility that has no</p> <p>22 public access. And AOC 1 is used intermittently by</p> <p>23 the Coast Guard personnel or their authorized visitors</p> <p>24 for recreation such as birding and fishing. And --</p> <p>25 and there is a photo here that -- that shows some of</p>	Page 9

<p>1 the marine traffic that does go through the inlet. If 2 you're local to the area, you know there's whale 3 watching. There's a lot of commercial and 4 recreational vessels that do traverse that -- that 5 inlet. So it is actively used.</p> <p>6 So just to recap of the current 7 conditions, it's a -- U.S. Navy had operated AOC 1 8 from 1918 to 1946. And AOC 1 consisted of a pier and 9 a boathouse. And a large portion of AOC 1 is now gone 10 due to the effects of coastal erosion.</p> <p>11 So I just have a couple of slides, and 12 it's to go over the federal cleanup program to give 13 everyone some context about how the Army Corps of 14 Engineers goes about cleaning up a site. So if you 15 know anything about environmental legislation in this 16 country, one of the landmark pieces of law was the 17 Comprehensive Environmental Response, Compensation, 18 and Liability Act, or CERCLA. It was passed by 19 Congress in 1980, and it establishes the process for 20 which the federal government, whether it be the Army 21 Corps of Engineers, EPA, or any other agency or 22 department, would go about investigating and cleaning 23 up a property.</p> <p>24 So it all starts with this process 25 here. And it's the preliminary assessment and site</p>	Page 10	<p>1 time during this process, if there's eminent threats 2 to human health or the environment, there could be 3 what -- an interim remedy initiated. They call that a 4 time-critical removal action. And so you don't have 5 to wait till the very end, or you don't have to wait 6 for years to address an imminent hazard.</p> <p>7 And then just for everyone's awareness, 8 there's often a confusion of lingo. When folks see 9 the federal government, they often kind of 10 characterize everything as a Superfund site, but the 11 Superfund is the -- actually a program by the EPA 12 under CERCLA. And EPA maintains a national priority 13 list, or an NPL list, that really determines the 14 Superfunds. The former Cape May Naval Air Station is 15 not an NPL listed sited. So it's technically not a 16 Superfund site.</p> <p>17 And then the Army Corps of Engineers, 18 this program is under the formerly used Defense Sites 19 Program. In 1986, the Superfund Amendments and 20 Reauthorization Act passed by Congress essentially 21 directed the Secretary of Defense to carry out 22 environmental restoration of facilities under the 23 jurisdiction of the secretary. And then a FUDS site 24 would be characterized as any property that was owned, 25 leased, or possessed by the DOD prior to October 17,</p>	Page 12
<p>1 inspection. And this initial phase is essentially to 2 obtain information, interviews, site walks about 3 feature of -- of a particular site and also to collect 4 data that would determine presence or absence of any 5 sort of contamination. If it were determined that 6 there needed to be a further study, it would go into a 7 remedial investigation, which is something we're going 8 to talk a lot about tonight.</p> <p>9 The remedial investigation has a -- a 10 few objectives. Mostly to get the nature and extent 11 of that contamination. And then once that has been 12 fully characterized, there could be a proposed plan. 13 And then if it goes to remediation, there would be a 14 design and construction. So on -- on the slide here, 15 that's remedial design, remedial action.</p> <p>16 Once the remedy has been -- been 17 constructed, there often is -- in some cases where 18 they have, like, a -- a groundwater treatment system 19 or something that requires operation and maintenance, 20 that O&M would be remedial action operation phase. 21 And then if there was residual contamination that 22 needed to be monitored over years or decades, that 23 would be long-term management.</p> <p>24 So that's, in a nutshell, the CERCLA 25 Process for investigation and -- and cleanup. At any</p>	Page 11	<p>1 1986, which is the date that the Superfund Amendments 2 Act was passed.</p> <p>3 And then in order to be eligible as a 4 FUDS site, there must be a hazard or contamination 5 that was released by the DOD onsite while the the DOD 6 had jurisdiction over the site. So in the case of our 7 property, it was transferred in 1946. So it would be 8 contamination that was caused by DOD prior to 1946.</p> <p>9 So key points, the environmental 10 investigation follows the CERCLA process, and then 11 USACE is tasked with executing the cleanup program 12 under FUDS.</p> <p>13 I'll just pause and see if anyone has 14 any questions on the material that I presented.</p> <p>15 All right. Hearing none. We'll move 16 onto remedial investigation.</p> <p>17 So this slide shows the history of 18 reports and studies that have been generated on AOC 1. 19 It starts in 1993 with a preliminary assessment. So 20 this was a site walk and interviews conducted by the 21 Corps in order to obtain information about operations 22 at the former Naval Air Station at Cape May. And they 23 did see debris along the shoreline, which I showed you 24 a picture of is -- is visible today. And then also, 25 there was a statement from a U.S. Coast Guard</p>	Page 13

<p>1 personnel at the time who said that potential 2 historical dumping of drums at AOC 1 may have 3 occurred. So because of those facts, we initiated a 4 FUDS project in 1995.</p> <p>5 In 1998, there was a site investigation 6 followed by a more elaborate technical memorandum that 7 was prepared in -- in 2019. So we get a lot of our 8 aerial photos and some of the background informations 9 from those SI studies. And they did recommend a 10 remedial investigation, which we initiated.</p> <p>11 There is a -- a work plan that 12 initiates an -- a remedial investigation. And it's 13 not just a couple-page pamphlet. It's hundreds, if 14 not thousands, of pages of backup to really make sure 15 that we fill data gaps and that we focus our -- our 16 study to really fully characterize the site. The -- 17 the full name for the work plan is the Quality 18 Assurance Project Plan, but it's a work plan.</p> <p>19 So those studies here listed, there was 20 an endangered and threatened species evaluation that 21 was conducted and then a geophysical evaluation that 22 was performed in order to obtain information to help 23 support the work plan. And then in -- earlier this 24 year in 2025, we reported our findings in the remedial 25 investigation report.</p>	Page 14	<p>1 review it to confirm that it's usable and to make sure 2 that -- that it's valid. We perform a risk 3 assessment, and then we report the findings.</p> <p>4 So this figure -- sorry -- this map 5 here shows the -- one of the figures that comes out of 6 the geophysical report. They did a -- a ground and 7 arial geophysical study. And so here's a photo of the 8 aerial drone that they used to try to get a lot of the 9 features that are out in the ocean. And then they 10 have this cart here, which is a ground penetrating 11 radar unit that they set up a grid, and they -- they 12 pull it across the beach in the gridded pattern to 13 kind of see if there's any sort of disturbance of the 14 subsurface structure or try to find any metal or any 15 sort of -- anything that would indicate buried 16 material.</p> <p>17 This figure here is one that I picked 18 out. I think it illustrates some of the anomalies. 19 This is metallic anomalies that they had identified, 20 both on shore and in the water. They tried to 21 identify what they were from the data, and in fact, 22 they did note that some of the signatures of the 23 geophysical survey appeared to show that there was a 24 corrugated steel sheet pile wall here at one point. 25 And then you could see that they have both in -- on</p>	Page 16
<p>1 So just to kind of recap a remedial 2 investigation. There's a few objectives, and one of 3 them is to define the nature and extent of potential 4 contamination. And then if -- with the data we 5 gather, we also process it to determine human health 6 and ecological risks.</p> <p>7 And there are a lot of tasks affiliated 8 with a remedial investigation. I -- you know, as I 9 said earlier, we did an endangered and threatened 10 species assessment. That's particularly important 11 here on the shoreline where you have endangered shore 12 birds and other endangered coastal species that need 13 to be protected, and we at great lengths had to 14 rejigger our field work so that we could work outside 15 of the nesting season for a lot of these shore birds 16 in the wintertime.</p> <p>17 And then also the geophysical survey, 18 which I'm going to talk about in a second with some 19 photos. We did excavation. A lot of sampling from 20 surface and subsurface. We did sediment sampling. We 21 did soil borings, and then we completed many of those 22 soil borings as monitoring wells to test the 23 groundwater beneath the site and upgrading of the 24 site.</p> <p>25 From all the data, we have a chemist</p>	Page 15	<p>1 and offshore metallic anomalies that were detected.</p> <p>2 And so we use this data to help direct 3 excavation. And so this is a long reach excavator 4 here, as noted by the -- the giant arm it has on it. 5 And they use this so that they can try to reach out as 6 far as they could at low, low tide to dig out some of 7 the locations where they had those metallic anomalies 8 located by the geophysics.</p> <p>9 And the reason that we were doing this 10 is because if there was a chemical release, it likely 11 would've come from a drum or a tank or some other 12 container. And so we were trying to visually identify 13 those features. And then when we did have the 14 sediment dug up, we did collect offshore sediment 15 samples.</p> <p>16 So this slide lists all the sampling 17 that we -- we did. We did 15 sediment samples from 18 those offshore excavations, 15 sediment and 15 surface 19 soil samples along the shoreline. This is shown in 20 the figure over to the far left where they used a -- 21 this hand auger here to -- to collect their samples.</p> <p>22 We did drilling shown on the center 23 figure where we collected 20 surface -- or 20 24 subsurface and 10 surface soil samples. And then five 25 of those soil borings were completed as monitoring</p>	Page 17

<p>1 wells. And then we tested the groundwater collected 2 from those monitoring wells. 3 The chemicals that we tested for 4 include several groups of chemicals that are volatile 5 organic compounds. So that -- that is, like, 6 something that volatilizes, and you could almost smell 7 it. Like, gasoline. Like, benzene is a VOC compound. 8 Semi-volatile organic compounds. Polycyclic aromatic 9 hydrocarbons. So that would be something, like, a 10 combustion byproduct like ash or cinders. Metals, 11 1,4-dioxane, pesticides, and explosives. 12 So this shows the locations of our 13 sampling points. Starting from this, the larger map, 14 we had five wells. So they were kind of around the 15 perimeter of where AOC 1 was in our study area. And 16 then we had one that was further upgradient that was 17 to help us get a better sense of groundwater in the 18 immediate location of our study area. And then this 19 insert here on the bottom left shows all the sampling 20 points, whether it be the test pits that you can see 21 kind of overlaps some of the -- the geophysical 22 anomalies. We had sediment and surface soil that was 23 collected along the shoreline. And then we had 24 samples collected along the roadway as well. 25 So from the data we created, they kind</p>	<p>Page 18</p> <p>1 concentrations up outside of our study area. 2 So this is the final figure of this 3 type. And this is of another chemical group, DDT. 4 That's a pesticide compound. And again, as you can 5 see in the water, it was detected. It -- there were 6 detections of it at SD 1, 2, 3, 4, and 5. And as you 7 can see, it does appear to be along the roadway. As 8 if -- as a pesticide, it was applied, it was likely 9 applied along the roadway for pest control. 10 And so at this point, I'd like to pass 11 it over to Amy Rosenstein to talk about the risk 12 assessment. 13 MS. ROSENSTEIN: Well, once we collect 14 all that data, we have to figure out what to do with 15 it. And to consider whether there are any 16 unacceptable human health or ecological risks 17 associated with the data. 18 So as part of the risk assessment, we 19 look at potential receptors. And that means either 20 humans who may contact the contaminants at the site or 21 ecological receptors who might live at the site and 22 contact anything that's there. 23 At this site, as you heard, it was -- 24 it's a closed site. So the potential human receptors 25 are occasionally recreational users who might be</p>
<p>1 of call these stoplight figures because they have 2 these kind of colorful data bars here where it's -- 3 the green means it was below our project action limit. 4 And then the warmer colors means that it was of higher 5 concentration. 6 They did these compound by compound. 7 And because there's so many compounds, I just picked 8 out three from different chemical groups to help 9 illustrate the findings. And so this figure is of 10 total PAHs, polycyclic aromatic hydrocarbons. And as 11 you can see, they're mostly pretty low concentrations 12 below the PALs. There are a couple locations in 13 yellow that are above, but there's not really a 14 signature that would demonstrate a release area. And 15 then you'd also see from the figure up on the -- the 16 insert that's up on the top righthand that there was 17 some detections above the PALs in our soil boring that 18 was done outside of our study area as well. 19 So similar figure, but this is of a 20 different chemical. This is of lead. You know, lead 21 is a metal that we would typically sample for at a DOD 22 site. And as you can see, there is some test pits 23 where we had detections, but it doesn't appear to be a 24 release area. And it's -- it's kind of all -- kind of 25 randomized. And then again, we see some similar</p>	<p>Page 19</p> <p>Page 21</p> <p>1 exposed to surface soil. Trespassers who might be 2 exposed to sediment, although trespassing is probably 3 not very common here since it's a secure area, but 4 it's a possibility. 5 and then I -- we looked also at 6 construction workers. Although the site -- we looked 7 at construction in terms of future shoreline 8 stabilization projects or those types of things that 9 might occur, it is not really a site that could be 10 conducive to building any buildings. So we don't 11 assume any residential or industrial future use there. 12 So they're exposed to aggregate soil. 13 That means both surface and subsurface potentially and 14 possibly to groundwater while they're digging. 15 For the ecological receptors, we looked 16 at terrestrial mammals and migrating birds. We did 17 not consider surface water to be immediate of concern 18 here because the fact of the matter is, with all the 19 tides going back and forth and the erosion over time, 20 we didn't think that there would be a direct impact 21 onto the surface water of the inlet. So we did not 22 consider that and did not sample for it as well. 23 Okay. So the risk assessment starts 24 with a conceptual site model, which outlines the 25 potential sources, release mechanisms, exposure media,</p>

<p>1 and exposure route. And again, the media could be 2 soil, groundwater, sediment, or surface water. And as 3 I said, we deleted surface water as a potential 4 exposure route based on the unlikely that any 5 contaminants left from 1946 would still be there in 6 the surface water today.</p> <p>7 Exposure routes, and this is for the 8 human receptors, they include incidental ingestion, 9 which is of soil. So when people are possibly playing 10 in the sand or something, they could possibly ingest 11 some soil. Inhalation, if there were any volatile 12 compounds or dust containing contaminants, they could 13 be exposed that way. Dermal contact or fish 14 ingestion, and we did not consider fish ingestion. So 15 as I said at the beginning, we look at everything, and 16 then we only look at those ones that are realistic for 17 the site after that.</p> <p>18 And I had mentioned the human receptors 19 are construction workers potentially in the future, 20 trespassers, or recreational users.</p> <p>21 What is going on? Enter. Right. Oh, 22 there we go. Got it. Sorry.</p> <p>23 This slide, slide 30, shows an 24 ecological conceptual site model along the same lines, 25 but looking at animals or plants or biota -- aquatic</p>	<p>Page 22</p> <p>1 We did have exceedances of the 2 screening levels for pesticides, but in general, 3 pesticides were put down across the entire U.S., DDT 4 and DDE, DDD, especially for mosquito control back in 5 the day. And as Greg showed in the figure that it was 6 found mainly on the shore, and we determined that that 7 couldn't be attributable to DOD past use.</p> <p>8 So the key points are for the remedial 9 investigation is that we investigated, reviewed 10 historical documents, collected new data to determine 11 the nature and extent of the potential contamination.</p> <p>12 The visual inspection of the geophysical anomalies did 13 not reveal any physical sources. The chemical data 14 did not indicate a spill area. And risk assessment 15 identified no unacceptable risks to human or 16 ecological receptors.</p> <p>17 And if there are any questions, I'll 18 take them now, and then I'll hand it back over to 19 Greg. Thank you.</p> <p>20 MR. HENCIR: Thank you, Amy.</p> <p>21 So now we're going to talk about the 22 proposed plan. So because there was no DOD 23 attributable spill of CERCLA hazardous substances that 24 were identified during the remedial investigation and 25 there were no unacceptable risk of CERCLA hazardous</p>
<p>1 biota that might be exposed. And the same exposure 2 media were considered. And the same exposure routes 3 except this one would include food chain. For 4 example, benthic invertebrates, if they were 5 contaminated and then they were eaten by shorebirds, 6 that's the food chain. That would be the exposure 7 route through the food chain.</p> <p>8 And so the -- the ecological receptors 9 we considered were terrestrial, including plants 10 invertebrates, small mammals, and birds. And those in 11 the intertidal zone, which would be benthic 12 invertebrates, aquatic organisms, and wading birds.</p> <p>13 So the remedial investigation and the 14 risk assessment found that there's really no 15 attributable risks that could be attributable to former 16 Department of Defense activities at the site. There 17 were no physical evidence of -- of drums or any other 18 types of metal sources that may have contained 19 hazardous substances. And then as Greg mentioned, 20 there was no indication of a spill area attributable 21 to the pre-1946 former operations.</p> <p>22 Human health, again, had -- we 23 looked -- we quantify the exposures through the 24 exposure routes and found that there was nothing 25 unacceptable there. And the same for ecological.</p>	<p>Page 23</p> <p>1 substances that were found to be present, then the 2 remedial action of AOC 1 under CERCLA is not required.</p> <p>3 And the preferred alternative is no further action.</p> <p>4 Also, community feedback is important 5 to the Army Corps of Engineers. It's a requirement of 6 the proposed plan that we have a public meeting to 7 obtain comments or questions from the public. But if 8 there -- if someone wants to obtain the hard copy of 9 the proposed plan, we have copies here. But it's also 10 available at the public library, and it's 11 electronically available on the Army Corps of 12 Engineers' website. It's shown here. But I would 13 recommend go to your favorite search engine -- engine 14 and type in USACE Naval Air Station Cape May, and 15 it'll pop up in, like, the first ten results.</p> <p>16 That proposed plan is available for 17 review, and if there are any questions or comments on 18 it, either state them verbally here in the meeting or 19 in writing at this -- you can provide them in writing 20 at this meeting, or you could submit written comments 21 postmarked by August 6, 2025, to me. On the screen is 22 mailing address and my email. If you're at the 23 meeting and want to have my email or address, you 24 could just pick up a copy of the proposed plan or fact 25 sheet that's here, and it's -- it's on it for you.</p>

<p style="text-align: right;">Page 26</p> <p>1 So the next steps is the Army Corps of 2 Engineers will respond to all comments, whether it be 3 verbal or written, that are received by August 6, 4 2025. And then we will finalize our proposed plan and 5 prepare a record of decision. The record of decision 6 will include transcripts of verbal comments and copies 7 of written comments. It will include a responsiveness 8 summary prepared by the Army -- Army Corps to all 9 those comments that were received before August 6th. 10 And then it'll also have the selected remedy.</p> <p>11 So I'll pass it over to Beth.</p> <p>12 MS. GOSELIN: Okay. Thank you for 13 attending tonight's public meeting on the U.S. Army 14 Corps of Engineers' proposed plan for area of concern 15 1, abandoned dumping station at the former Naval Air 16 Station Cape May in Cape May, New Jersey.</p> <p>17 At this time, we'll open the meeting up 18 for any public comments on this plan. If you'd like 19 to speak, please state your name and any organization 20 you're working with.</p> <p>21 MR. VONDY: So I'll just summarize. 22 Will this pick me up?</p> <p>23 I -- I guess if you're able to put it 24 on your lapel, that would be -- it should be able to 25 reach.</p>	<p style="text-align: right;">Page 28</p> <p>1 In regards to the pesticides, we 2 recognize that CERCLA is -- you're not required to 3 remediate pesticides under CERCLA. New Jersey has 4 historically applied pesticides technical guidance. 5 So that is one remaining area of nonconcurrence.</p> <p>6 These issues will be summarized in a -- 7 a letter we'll provide to Army Corps. That's it. 8 Thank you.</p> <p>9 MR. HENCIR: Yeah. Thank you, Scott.</p> <p>10 We look forward to receiving your letter with your 11 formal comments. And we will respond to formally to 12 your letter. We always appreciate working with the 13 New Jersey DEP. Thank you for being a fantastic 14 stakeholder in this project, and thank you for 15 attending tonight.</p> <p>16 MS. GOSELIN: Okay. I think that's it 17 for questions. Thank you all for your interest and 18 participation.</p> <p>19 As a reminder, if you have any 20 additional comments, the U.S. Army Corps of Engineers 21 will be accepting written comments postmarked by 22 August 6, 2025. All comments, both verbally and 23 written, will receive equal consideration.</p> <p>24 We want to thank the convention center 25 team here for the support, and this meeting is now</p>
<p style="text-align: right;">Page 27</p> <p>1 MR. VONDY: Okay. This is Scott Vondy 2 from NJDEP. Thank you for the presentation tonight. 3 NJDEP provided two rounds of comments on the remedial 4 investigation report. At the time of this meeting, 5 New Jersey's eco risk assessor is still reviewing a 6 few of the ecological risk-related comments that the 7 Army Corps responded to our comments on.</p> <p>8 In response to this proposed plan, the 9 State will draft a -- a letter with our remaining 10 concerns with the proposed plan. CERCLA and the State 11 have slightly different requirements when it comes to 12 remediating sites.</p> <p>13 The main thing being for human health, 14 the State sets standards based on exposure pathways, 15 residential, and nonresidential use scenarios. So 16 there are a few contaminants on this site that exceed 17 New Jersey's residential standards but are below our 18 nonresidential standards. In cases like that, the 19 State requires an institutional control.</p> <p>20 We recognize that Army Corps does not 21 own this property, but we ask that the Army Corps work 22 with the current site operator, the -- the Coast Guard 23 to put something in the base master plan or some kind 24 of alert that holds in perpetuity that there is some 25 contamination left on this property.</p>	<p style="text-align: right;">Page 29</p> <p>1 officially concluded. Thank you.</p> <p>2 THE REPORTER: Going off the record at 3 6:40 p.m.</p> <p>4 (Whereupon, the meeting concluded at 5 6:40 p.m.)</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

1 CERTIFICATE

2 I, SAMUEL HAUT, the officer before whom the
3 foregoing proceedings were taken, do hereby certify
4 that any witness(es) in the foregoing proceedings,
5 prior to testifying, were duly sworn; that the
6 proceedings were recorded by me and thereafter reduced
7 to typewriting by a qualified transcriptionist; that
8 said digital audio recording of said proceedings are a
9 true and accurate record to the best of my knowledge,
10 skills, and ability; that I am neither counsel for,
11 related to, nor employed by any of the parties to the
12 action in which this was taken; and, further, that I
13 am not a relative or employee of any counsel or
14 attorney employed by the parties hereto, nor
15 financially or otherwise interested in the outcome of
16 this action.



17 SAMUEL HAUT

18 Notary Public in and for the
19 State of New Jersey

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1 CERTIFICATE OF TRANSCRIBER

2 I, KATHRYN L. REED, do hereby certify that
3 this transcript was prepared from the digital audio
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6 proceedings to the best of my knowledge, skills, and
7 ability; that I am neither counsel for, related to,
8 nor employed by any of the parties to the action in
9 which this was taken; and, further, that I am not a
10 relative or employee of any counsel or attorney
11 employed by the parties hereto, nor financially or
12 otherwise interested in the outcome of this action.

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15 KATHRYN L. REED

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