



DEPARTMENT OF THE NAVY

NORTHERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
10 INDUSTRIAL HIGHWAY
MAIL STOP, #82
LESTER, PA 19113-2090

N60478.AR.000262
NWS EARLE
5090.3a

IN REPLY REFER TO

5090
Ser 1916/1821/JPK

JUL 26 1993

U. S. Environmental Protection Agency
Attn: Paul Ingrisano
J. Javits Federal Building
New York, NY 10278

Re: NAVAL WEAPONS STATION (NWS) EARLE, COLTS NECK, NJ
REMEDIAL INVESTIGATION (RI) REPORT

Dear Mr. Ingrisano:

In response to your letter dated June 8, 1993, specific responses are provided in the attachment for each comment which had not been fully answered previously. Where issues cannot be resolved at this time, a plan of action is proposed.

If you have any questions or comments concerning this matter, please contact me at (215) 595-0567.

Sincerely,

A handwritten signature in cursive script, appearing to read "John P. Kolicius".

John P. Kolicius
Remedial Project Manager
By direction of the Commanding Officer

Copy to:
NJDEPE, Robert Marcolina
NWS Earle, Gus Hermanni

ATTACHMENT

1. **COMMENT:** The Phase II Study determined (horizontal components of) ground water flow for the site.

The added words (horizontal components of) can be inserted in the report. Vertical extent will be evaluated in the next phase.

2. **COMMENT:** The grouping of sites..... An alternate, and perhaps more interpretable method is to present a specified contaminant's concentrations in bar graph form on a map of the entire site. Computer modeling software packages are available to facilitate the presentation of data in this format,...

Few sites appear to be in close enough proximity to each other to directly influence each other. Background sampling to be performed in the next phase should help to identify hydrogeologic connections and influences. Contaminant concentration mapping will also be scoped into this phase.

3. **COMMENT:** The Navy must provide this wetlands survey to EPA for review.

The wetlands survey conducted by the Soil Conservation Service in 1989 was inaccurate in several areas. The Navy is utilizing a Fish & Wildlife Service contract to obtain a detailed wetlands mapping of NWS Earle. Fieldwork is scheduled for this summer with completion later this year.

4. **COMMENT:** ... compliance with Section 7 of the Endangered Species Act is an ARAR. If it has not yet been initiated, an informal Section 7 Consultation will need to be requested from the United States Fish and Wildlife Service to identify endangered or threatened species which may be associated with these sites.

A Section 7 consultation will be requested.

5. **COMMENT:** A concise list of the vegetational community and any wildlife observed or believed to be potentially present should be included. The base biologist referenced on page 3-32 may be able to provide such information without having to require additional fieldwork.

The base biologist will be consulted regarding more specific site information. This information will be incorporated into a revised risk assessment.

6. **COMMENT:** The resulting contaminant concentrations at the receptors should be used as input to the inhalation pathway of the baseline risk assessment.

Contaminant concentrations due to air exposure were calculated using the model in Table 6-22 in Section 6.3.2.5. These resulting doses will be used to determine risk to receptors.

7. **COMMENT:** MCLs are Applicable or Relevant and Appropriate Requirements (ARARs). SDWA is both a chemical and location-specific ARAR.

The Navy agrees that SDWA is an ARAR.

8. **COMMENT:** Location-specific ARARs shown in Table 7-2 should include the Safe Drinking Water Act (SDWA).

SDWA will be added to Table 7-2.

9. **COMMENT:** Knieskern's beakrush is now a federally listed endangered species.

The report will be updated to indicate that Knieskern's beakrush is now a federally listed endangered species.

10. **COMMENT:** Dust controls will be implemented... If it is decided that in-situ volatilization is the selected remedy for this site, vapor phase carbon treatment of the air stream will be implemented. Volatile organic air emissions from possible air stripping of the groundwater were also identified as a major concern and tests will be performed to determine the required air emissions control.

Volatile air organic emissions will be considered in any design effort.

11. **COMMENT:** RCRA is an Applicable or Relevant and Appropriate Requirement (ARAR). The no-action alternative is inconsistent with RCRA Corrective Action because it is not protective of human health and the environment.

(1-3) RCRA will be an ARAR to soil remediation.

(5) The no-action alternative is considered, but only implemented if it meets ARARs.

(6-13) RCRA will be an ARAR for these activities.

12. **COMMENT 1:** Consultation on Coastal Zone issues should be initiated.

NJDEPE Division of Coastal Resources will be contacted.

COMMENT 2: A Stage 1 Cultural Resources Survey should be conducted as part of the RI/FS process.

A survey will be conducted.

COMMENT 3: A precise delineation of 500 year floodplains still needs to be made.

No precise information exists regarding floodplains at NWS Earle. Based upon Flood Insurance Rate Map information for areas surrounding the base, no areas of the mainside area are believed to be within the 100 year floodplain. For planning purposes, the 100 year flood elevation at the waterfront area is 13.0 feet. No 500 year information is available.

COMMENT 6: Endangered Species Act is listed as a site-specific ARAR... Navy should continue to coordinate with USFWS.

Remedial designs will be coordinated with USFWS.

COMMENT 7: National Marine Fisheries Service should be contacted to determine if there are any breeding grounds or habitats for endangered marine species which might be affected...

NMFS will be contacted.

COMMENT 8: The Farmland Protection Policy Act of 1981 and the USDA Farmland Protection Policy may apply to portions of NWS Earle. Of particular note are the cranberry bogs...

Although the bogs in question are not cultivated, impact to agricultural lands will be considered in any selection of remedy.

COMMENT 9: The ATSDR Toxicological Profile for Chromium, a chemical of concern at NWS Earle, is not included.... also, on page R-2, an EPA personal communication is cited as coming from Region II, Philadelphia; no individual is referenced.

The profile for Chromium will be included. The Navy contractor has been requested to identify the EPA Region III point of contact and correct the reference.

COMMENT 10: The Navy will have to take action to ensure that its RI/FS and subsequent remedial action comply with NEPA.

The Navy will take the necessary actions.

13. **COMMENT:** The contractor must clarify any reasons for deviation from EPA guidance/directives.

The Navy has requested this clarification from the contractor.

14. **COMMENT:** As the site is still in use, operations should be changed as necessary to prevent further groundwater contamination and monitoring of groundwater should be continued.

Operational changes are planned to use burning pans to eliminate burning on the ground surface. Continued groundwater monitoring is anticipated.

15. **COMMENT:** Section 4.4.1 incorrectly states that the site slopes southwest. It is customary and less confusing to have the site maps oriented with the top to the north.

Section 4.4.1 will be corrected and the map will be re-oriented.

16. **COMMENT:** The extent of... concentrations in groundwater should be delineated. Site should be remediated as necessary.

Additional sampling will be required to characterize this site.

17. **COMMENT:** Remediation should be conducted as necessary...

Any necessary remediation will be conducted after completion of the Feasibility Study.

18. **COMMENT:** Contaminated soils and sediments should be removed at the site to prevent further groundwater and stream contamination. Groundwater should be remediated to prevent further discharge of contaminants to the stream. The large stone pile should be investigated as possible source of contamination.

A removal action is planned for soils and sediments. Any additional remediation will follow the FS.

19. **COMMENT:** Trace elements were found in concentrations of concern at the site in groundwater. Contaminated sediments in the depression should be removed to prevent further groundwater contamination.

A removal action for sediments will be planned for FY94.