



DEPARTMENT OF THE NAVY  
NAVAL WEAPONS STATION EARLE  
COLTS NECK, NEW JERSEY 07722

114  
N60478.AR.000011  
NWS EARLE  
5090.3a

IN REPLY REFER  
TO NO.

092

15 MAR 1985

Mr. Russel H. Wyer  
Director, Hazardous Site Control Division  
Office of Emergency and Remedial Response  
WH-548-E  
Environmental Protection Agency  
401 M. Street, SW  
Washington, DC 20360

PROPOSED INCLUSION OF NAVAL WEAPONS STATION EARLE, COLTS NECK, NJ TO THE  
NATIONAL PRIORITIES LIST (NPL) OF UNCONTROLLED HAZARDOUS SUBSTANCE FACILITIES

Through a recent discussion between Lieutenant Colonel Dean Nelson (DOD Liaison to EPA) and Commander Ray Pylant of this command, it was learned that you needed additional information for your evaluation of our December 14, 1984 comments relative to the subject nomination. Accordingly, the following additional information is offered:

-- The first enclosure displays the calculations we used to estimate the maximum volume of paint chips that could have been generated at Site 19 over the life of the facility.

-- The second enclosure describes how information contained in the Navy's Initial Assessment Study apparently misled the evaluator to compute an unrealistic quantity of waste which could have been disposed of at Site 10, a situation similar to that under discussion for Site 19.

-- The third enclosure contains the military specifications for the zinc chromate primer paint and the enamel finish coat paint we have used over the years for the painting of Naval Ordnance. As will be seen in these pages, lead occurs only as a minor element in the formulation of these paints.

Your continued consideration in this matter is greatly appreciated.

Sincerely,

P. S. BENSON  
Captain, U. S. Navy  
Commanding Officer

Encl:

- (1) Drawing No. SK-1878A
- (2) Site 10 Evaluation
- (3) Specifications for Painting of Naval Ordnance

Copy to:

Environmental Protection Agency, Region II  
Chief of Naval Operations, Environmental  
Protection Division (OP-45)

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NATIONAL PRIORITIES LIST (NPL) OF UNCONTROLLED HAZARDOUS SUBSTANCE FACILITIES

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Blind Copy to:

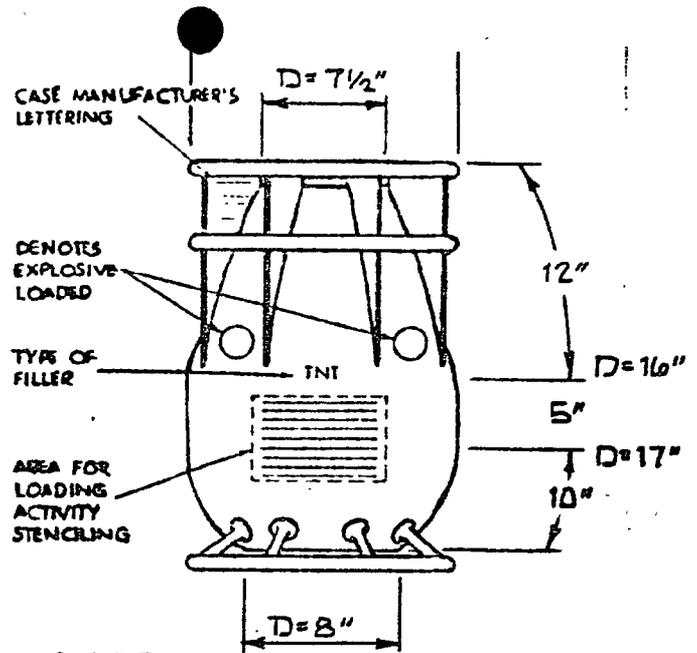
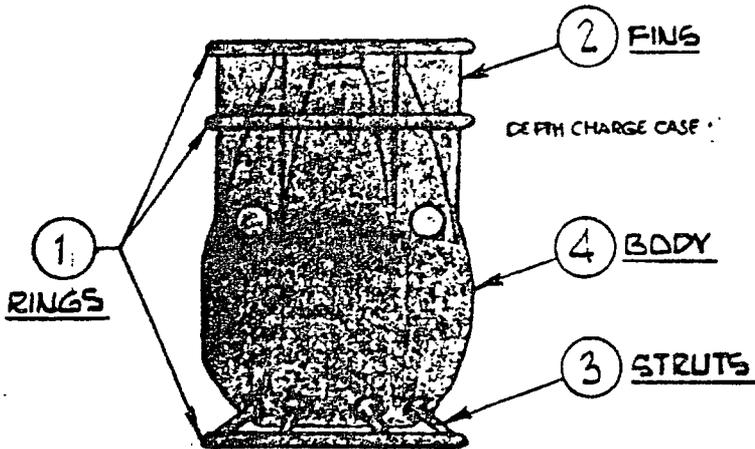
CHNAVMAT (Code 04H2)

COMNAVFACENGCOM (Code 112)

COMNAVSEASYS COM (SEA 6412)

↳ NORTHNAVFACENGCOM (Code 114)

NEESA (Code 112N)



EXTERNAL SURFACE AREA

- ① 3 RINGS (2.25" x 17"π) x 3 ----- = 360.52
- ② 8 FINS [2/8 x (5 x 12") x 2 + (5" + 12") x 1/8] x 8 ----- = 337.00
- ③ 8 STRUTS (2.25" x 3") x 8 ----- = 54.00
- ④ BODY (A) (7.5")<sup>2</sup> π ----- = 44.18
- (B) (8")<sup>2</sup> π ----- = 50.27
- (C) (7.5"π + 16"π) / 2 x 12" ----- = 442.96
- (16"π + 17"π) / 2 x 5" ----- = 259.18
- (17"π + 8"π) / 2 x 10" ----- = 392.70

TOTAL----- 1940.81 IN.<sup>2</sup>

USE 19.41 IN.<sup>2</sup> OR 13.5 FT<sup>2</sup>

PAINT FINISH

TWO COAT SYSTEM FOR PAINT AT  
 AVERAGE 5 MIL DRY FILM THICKNESS  
 PER COAT (1 MIL. = 1/1000 IN.)  
55 GAL. DRUM = 12.705 IN.<sup>3</sup>

PRODUCTION

ANNUAL PRODUCTION: 1,000 UNITS  
 PROGRAM: 20 YEARS  
TOTAL: 20,000 UNITS

19.41 IN. x .010" = 19.4 IN.<sup>3</sup>  
 19.4 IN. x 20,000 = 388,011 IN.<sup>3</sup> TWENTY YEAR TOTAL  
 388,011 IN. ÷ 12.705 = 30,54 DRUMS

USE: 31 (55 GAL.) DRUM EQUIVALENT PAINT WASTE

DRAWING No. SK-1878A

## SITE 10 EVALUATION

The Initial Assessment Survey (on page 6-11) describes operations which were conducted at the Ammunition Rework Facility presumably from "the early 1940's until the mid 1970's". This section of the Initial Assessment Survey goes on to indicate that grit and paint residue collected from this operation, currently at the rate of "approximately 30 gallons/week", was disposed of mostly in the "Box Yard" landfill (Site 10) prior to disposal operations being taken over by a contractor in 1977. From these statements the EPA evaluator proceeded to determine that the volume of waste at Site 10 was 1,092 drum equivalence [30 gal/wk x 52 wk/yr x 35 yrs ÷ 50 gal/drum = 1,092 drums].

Reference to page 6-6 of the Initial Assessment Survey indicates that the "Box Yard" landfill (Site 10) was in use only during 1953-1965, a period of 12 years. This information is further substantiated by the description of Site 10 on page 3-11 of the Initial Assessment Survey, which documents the operative dates of Site 10 as being "1953-1965".

The contradiction posed by these various sections of the same Initial Assessment Survey is disturbing, and must be attributed to the contradictory "sources" upon which this study was based. Based on the geographic size of the site in question, and the norm for operations during that era, it must be concluded that Site 10 was active for no more than 12 years.

Following the logic contained in the EPA evaluator's assessment of Site 10, the following "maximum threat" for Site 10 must be deduced:

$$30 \text{ gal/wk} \times 52 \text{ wk/yr} \times 12 \text{ yr} \div 50 \text{ gal/drum} = 374 \text{ drum equivalence}$$