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To	Scott Palmer		
From	Rich Johnson		
Co.	NAFAC		
Co.	WESTON		
Dept.	Phone # 430 7315		
Fax #	897 6199		



11-1-1989

**RESPONSE TO NJDEP REVIEW COMMENTS  
 TO THE SITE INVESTIGATION PLAN  
 FOR 16 SITES AT EARLE NWS  
 (NOVEMBER 1989)**

NJDEP Comment

NAFAC Response

- 1 This is NAFAC's decision. WESTON's opinion is that the RCRA sites are better handled separately since they are generally on a more definite faster track.
- 2 A base map showing SI sites will be provided in final work plan.
- 3 QAPP & HSP will follow closely those for the RI work. To avoid unnecessary duplication we are waiting to complete the RI documents. It was agreed by the TRC that the general elements of the RI QAPP and HSP will apply to the SI.
- 4 We agree with this comment and will include in the final SI plan an initial site reconnaissance to provide accurate identification of site features, and sampling locations. This will be documented by photographs and detailed sketch maps. The final reports will include this information plus surveyed sample and well locations.
- 5 Comment noted. The QAPP will contain detailed sample QC requirements.
- 6 The final work plan will be editorially reviewed for consistency of use of the terms "soil" and "sediment".

Specific Comments

- 1 Presently no production wells are on-line at the base. The final plan will note this.

NJDEP CommentNAFAC Response

- 2 The 'contaminants of concern' are ions or compound, or materials containing them, that are on EPA's target list, or they are explosive compounds. This section is only a very general discussion; no decisions have been made beyond a broad identification of possible contaminants based on site history.
- 3 The QAPP will itemize all QC samples.
- 4 Table 5-2 will be amended as requested.
- 5 Well points are only proposed in the Wetlands adjacent to Landfill Site 6. This was done to minimize wetlands disturbances. All other wells will follow NJDEP standard practice.
- 6 Additional rounds of groundwater sampling may be recommended after the review of the initial results. This would be helpful particularly if low concentrations of contaminants are found or other ambiguities are found. Where nothing is detected, or conversely where high level of contaminants occur we do not think additional sampling will add much.
- 7 In response to NJDEP comments we suggest revising sampling plan to include three monitor wells, and to sample soils in a simple grid of 16 points at depths of 0 - 2 feet.
- 8a This paragraph simply summarizes the initial site review and does not pretend to be any more than informed conjecture. NJDEP is free to take or leave this information which does not heavily weigh the sampling program.
- 8b The paragraph suggests nothing to WESTON except perhaps casual surveys using OVA or HNU instruments should be used to establish personnal protection baselines and not much

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else. Site personal protection will be determined by monitoring results during the work period. The validity of past data will not be an issue.

8c The Navy and WESTON's position is that characterizing landfill waste based on point samples is not useful or necessary. Because of the inhomogeneous nature of the material nothing could be ruled out by this method and no quantitative estimates could be made.

We do agree that some surface drainageway sampling may be useful. This could be scoped after a site inspection.

8d A subsequent site visit with the TRC found no leachate. It was mutually agreed to defer the issue.

8e Groundwater Sampling is planned.

8f We are open to further discussion regarding groundwater sampling in the wetland area adjacent to Site 6. The main limitation is access and required permitting from the Wetlands Commission.

8g The final work plan will specify TCL organics, TAL inorganics and pesticides/PCB's for groundwater analysis.

8h The BNA scan of groundwater samples should address potential petroleum releases; does NJDEP have any other suggestions?

9 WESTON can propose a sampling program to be completed once the site location is established. Based on the known listing the shallow subsurface soils should be sampled for TPH and BNA's. We do not see the need for groundwater sampling unless significant soil contamination is found.



NJDEP Comment

NAFAC Response

10 We need to establish sampling points during a site visit. There was no documented spill at this site. It is all conjecture. We do not know why activity would have occurred before the asphalt paving was placed. Why analyze for TAL inorganics?

11 The Navy and WESTON will inspect the BPDO area (Site 13) to identify possible sampling locations and include additional recommendations in the final SI Work Plan.

12 How do we sample a 16,000 ft<sup>2</sup> warehouse for traces of an alleged spill of several ounces of mercury that occurred, and was vacuumed up 20 years ago.

13 - 15 Sites 15, 16 and 23 will be inspected by WESTON and NAFAC to better address several issues raised by NJDEP.

16 Sampling can be done at both Sites 24 and 25.

17 Site 27. WESTON and NAFAC will inspect the site and address sampling locations. Analysis will be expanded to cover heavy metals and TCL organics + 40. EP Tox metals will also be done in anticipation of removal of the waste.

TCLP  
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We do not understand the purpose of doing full TAL inorganics analysis for these soils and waste since many of the analytes are common earth elements such calcium and sodium.

18 Comment noted.

19 Review of previous data on PCB spill should be reviewed prior to the SI.