

RESPONSE TO USEPA COMMENTS
ON THE RI WORK PLAN, NWS EARLE
RECEIVED 20 DECEMBER 1990

- A. WESTON's experience with numerous D.O.D. sites similar to those found at NWS Earle, plus experience with potential DNAPL situations leads us to believe that the proposed technical approach to groundwater monitoring is adequate. We have discussed at previous TRC meetings the need to establish a deep monitoring point or points based on the results of the initial well sampling results. This is documented in the TRC minutes for August 1990. However, it is also WESTON's opinion that EPA's comment a, Attachment 1, and previous statements regarding DNAPLs is unnecessarily speculative, and is not based on any known site histories.
- B. A proposal for a test pit investigation at Landfills 3, 4, 5, 7 and 10 was presented to EPA in December 1990 after extensive discussion by the TRC. The test pit investigation has been included in the Work Plan (January 1991). The Navy is prepared to proceed with this plan. EPA has not commented formally at this time, but we understand that the general approach is acceptable to both NJDEP and USEPA.
- C. Full TCL/TAL Scan for sediments is being done because for most constituents, sediment, not water transport, is the prime concern at these old sites.
- D. The sampling program at Site 20 has been expanded to include organic constituents.

EPA did not number the remaining text sections. The following responses are numbered by paragraph as they occur in sequence in EPA's comments.

- para 1,2 See response to comments A.
- para 3 WESTON will use an effective porosity of 0.2 as requested. We feel that we have previously explained that the complexity and uncertainty of determining porosity in the laboratory does not warrant the effort.
- para 4 Comment noted. It does not appear that further response is necessary.
- para 5 No response required except to note that test pits have been included in the RI program.
- para 6 Slug test methods were distributed at the January TRC meeting and are included in the QAPP Addendum (February 1991)

- para 7 Comment noted. No response appears necessary except to note that seasonal variability in groundwater level and gradients will be discussed in the RI Report.
- para 8 No response necessary.
- para 9 See response to Comment B
- para 10 Continuous soil samples will be retained for the period of one year or at least until regulatory status of the sites is settled.
- para 11 Comment noted. No specific response appears to be necessary.
- para 12 Comment noted. Slug test procedures are included in the QAPP addendum (January 1991)
- para 13 No response required
- para 14 (Introduction Sentence)
- para 15 Section 4 of the RI work plan discusses regulatory limits. Any discussion of new data in the RI report will reference specific guidelines. The tables referred to by EPA in section 5 are taken from earlier reports and no attempt to edit them was made.
- para 16 EPA's comment that a glossary of terms would be helpful is well taken. Although it was not included in the Work Plan, one could be planned for the RI Report.
- para 17 EPA is correct. No air sampling is planned in the RI except that related to sample monitoring and personnel safety monitoring.
- para 18, 19, 20

These Comments relate to the Work Plan scope submitted in December 1989. Revisions to the soil/sediment sampling program were made in March 1990 and in the final Work Plan submitted in February 1991. We feel that several revisions have been made to the sampling scope to respond to USEPA comments. The soil/sediment sampling scope is summarized in Table 5-2 of the Work Plan.

- para 21 See responses to paragraphs 18, 19 and 20.

- para 22 At this time the QAPP requires CLP based detection limits on all CLP analyses. EPA is pointing out a general problem that we are aware of regarding detection limits and assessment of risk to aquatic life. However, we are not clear whether any additional response is necessary.
- para 23 No response necessary.
- para 24 Figure 5-4 of the work plan contains a reference "to a Pine Brook Road" which was included for general geographic reference. Pine Brook is not on or within close proximity of the site.
- para 25-26 The revised work plan outlines stream sampling for Site 10. Sampling locations are shown in Figure 5-6.
- para 27 The addition sampling and characterization for all sites added in response to USEPA and NJDEP comments are included in the work plan submittal of 1 January 1991.
- para 28 Major changes in sampling scope have been made in this program in response to comments from USEPA. Sampling for laboratory analysis will occur at all sites as outlined in the Work Plan (January 1991). However, we see no reason to select soil samples from perimeter monitor wells on the basis that contamination "can occur in unexpected places". That statement, in our minds, does not constitute a rationale for sampling.
- para 29 After a number of discussions with NJDEP representatives, it was agreed that the first round of water sampling for Target Compound list analytes at NWS Earle (planned for March 1991) will be analyzed by CLP methods with CLP detection limits. A letter confirming this decision will follow.
- para 30 No response necessary.
- para 31 The Site 2 sampling for explosive compounds and TAL inorganics is based on site history. We feel that excluding other organic compounds from the analyses is justified on this basis. Groundwater sampling results will provide additional assurance that releases have not occurred to groundwater; however this, we agree, is not a reason not to sample soils.
- para 32 Comment noted. No additional response required.
- para 33 No response necessary. Final QC sampling in QAPP reflects EPA comments.
- para 34 No response necessary.

- para 35 Figure 5-2 presents all that is known about Site 3 landfill. Better definition of the source area will be included in the RI report. The wells are placed on the perimeter of the site (based on vegetative conditions) with emphasis on downgradient locations.
- para 36 The word "divide" on the figure is, as far as we know a typographic error and had no meaning.
- para 37 Soil samples for VOC analysis will generally be taken below depths of 6 inches as stated in the Work Plan (January 1991)
- para 38 The four sediment and surface water samples are planned at springs and associated drainage ways (Work Plan Figure 5-3, January 1991). There are a number of seep areas, not just one spring.
- para 39 We do not understand this comment. It seems to be incomplete.
- para 40 Site 5. Updated site maps in the Work Plan (January 1991) reflect our best current understanding of site locations.
- para 41, 42 Source identification was addressed in the Work Plan (January) See response to Comment B.
- para 43 No response necessary.
- para 44 Comment noted.
- para 45 No response required.
- para 46 Tables 5-2 and 5-3 have been finalized in the January 1991 Work Plan.
- para 47 Site 10 is a landfill. Test pits will be excavated and sampled at this site.
- para 48 MW-11-1 or MW-11-2 may be "background" wells. This will be established during the RI. There is no MW-1.
- para 49, 50, 51
- Samples for VOC and BNA analysis will be taken at Site 20 and at Site 22.
- para 52 Such tables have been included in the revised RI Work Plan.