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30 September 1991

Mr. Paul Ingrisano
USEPA, Room 2230
26 Federal Plaza
New York, NY 10278

Dear Paul:

Enclosed is a copy of the Final SI Work Plan for Naval Weapons Station Earle. This plan includes revisions to the draft version which were made in response to review comments received by the Navy by EPA Region II, and NJDEP.

If you have any questions concerning this submittal, please contact Mr. Jerry Hoover at Northern Division.

Very truly yours,

ROY F. WESTON, INC.

John A. Williams, Jr.
Senior Project Geologist
Geosciences Department

JAW:mf
Enclosure

cc: J. Hoover - NAVFAC
N. Stencil - NAVFAC
R. Johnson - WESTON

OUTSTANDING INGRISANO COMMENTS

1. Section 5.3 - Site 1: Ordnance Demilitarization Site, Secured

- a. EPA recommends soil vapor as a screening tool for soil samples.
WES - VOC's are not a contaminant of concern, therefore this is not a critical screening tool.
- b. EPA - Soil samples should be analyzed for full TCL + 30, due to insufficient site background.
WES - Sites history is well documented, explosive compounds and TPH adequate.

2. Section 5.4 - Site 6: Landfill West of Normandy Road

GET BLDG Foundation Plans

? {

- d. EPA - split-spoon samples should be screened and analyzed for full TCL and TAL.
WES - Purpose of borings is to delineate boundaries of landfill. The need for characterization by test pits will be done during RI.

- e. EPA - surficial soil samples recommended.
WES - Site covered by building and paving, not practical.

passed to NOAA

- f. EPA - visual and soil gas survey of adjacent marsh recommended.
WES - Surface drainage at toe of landfill examined.

HNA screening, systematic survey not required

- g. EPA - Air monitoring should be completed around building.
WES - NJDEP results questionable, although Navy may want to consider some air monitoring program.

3. Section 5.5 - Site 17: Disposal Area Behind Training Barge

Same as Site 6.

5. Section 5.7 - Site 9: Landfill Southeast of "P" Barricades

- a. EPA - Approach same as Site 8.
WES - concur.

6. Section 5.8 - Site 12: Battery Acid Spill Site

- a. EPA - Describe size of the site.
WES - This was a forklift battery storage site, occurrence of spills speculative.

7. Section 5.9 - Site 13: Defense Property Disposal Yard

- a. EPA - Soil samples should be analyzed for TCL and TAL, also a soil gas survey would be helpful.
WES - Site use is known PCB's and semi-volatiles adequate.

Problem

why?

8. Section 5.10 - "Mercury Spill Site"

- a. EPA - inspect drainage pathways, if evidence of a release sample for TAL and TCL.
WES - get real.

?

9. Section 5.11 - Site 15: Sludge Disposal Site

- a. EPA - recommend soil vapor survey to locate site.
WES - soil gas not useful since volatile components of oily bilge water long gone.
- b. EPA - analyze samples for TCL.
WES - BNA which relates to hydrocarbons more appropriate.
- c. EPA - PA recommends soil borings.
WES - the need for deeper samples and/or monitor wells will be determined based on the results of surface sampling.

Problem

10. Section 5.12 - Site 16: Fuel Line Break

- a. EPA - where's the soil gas survey.
WES - approximate area of leak can be determined, because of the age of the spill and type of fuel, soil gas would not be effective.
- b. EPA - sampling scheme for soil borings is unclear.
WES - Weston's sampling plan appears logical.

? how do we know h.T. 50 gal

12. Section 5.14 - Site 24: Closed Pistol Range

- a. EPA - since iron was detected during SI it should be added as an analyte for sites 24 and 25.
WES - regional iron concentrations are high, however zinc will be added as an analyte.

13. Section 5.15 - Site 25: Closed pistol Range - Treated Rail Ties

- b. EPA - treated rail ties not addressed.
WES - there are treated ties all over the base, many of them attached to rails.

14. Section 5.16 - Site 27: Projectile Refurbishing Area

- a. EPA - state criteria for selecting soil samples, suggest soil vapor screening.
WES - criteria clearly stated, two samples in the drainage area, one in swale, areas of highest potential.
Soil vapor screening will be conducted?
- b. EPA - vertically characterize site.
WES - ?
- c. EPA - monitor wells.
WES - ?

16. Section 5.18 - Site 29: PCB Spill Site, Bldg C-16

- a. EPA - soil sampling required.
WES - no its not.

17. Waste Water Treatment Plant

- a. EPA - if NJDEP cannot address my concerns the Navy will have to in the SI plan.