



DEPARTMENT OF THE NAVY

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

IN REPLY REFER TO

5090
Ser 1696/1821/GFH

AUG 10 1992

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

Re: SITE A - CHILD DEVELOPMENT CENTER, NWS EARLE, NJ

Dear Mr. Ingrisano:

The Navy appreciates EPA comments and input in this matter. In regards to the comments listed in your letter of 10 July, 1992, the following responses are offered.

The Navy feels that the EPA's allegations regarding data usability are unsubstantiated. The laboratory blanks contained contaminants at contract acceptable levels of less than 5 times their respective Contract Required Quantitation Limit (CRQL) for methylene chloride, acetone, 2-butanone, and the common phthalate esters; and less than 1 times their CRQL for uncommon contaminants 1,1,1-trichloroethane, 4-methyl-2-pentanone, toluene and total xylenes. All contaminants found in the associated field quality control blanks, with the exception of methylene chloride, also occurred below levels within which the analytical laboratories are governed. Consequently, with the exception of methylene chloride, the level of associated blank contamination cannot appropriately be termed "extensive", nor is there a significant problem with the occurrence of "atypical" blank contaminants.

With regard to methylene chloride, the significant amount detected in the trip blank does not impact the sample data. All positive sample results qualified for blank contamination fall within the a qualification action level of 27 ug/l (i.e. 2.74 ug/l x 10 times rule for the common contaminants), as established by the highest amount of methylene chloride found in the laboratory method blanks. Given this information, the data in question does meet EPA's QA/QC standards.



Re: SITE A - CHILD DEVELOPMENT CENTER, NWS EARLE, NJ

Concerning data qualifiers, please note that Halliburton NUS, at the Navy's request, has added explanatory codes to the traditional data qualification flags used by the EPA (i.e. U, J, UJ, and R). The data qualifiers in this system can each result from several different conditions. The purpose of the data qualification codes is to provide "at a glance" the information which is addressed in the text of the data validation report. This presentation format may have misled the EPA to believe that the data quality is poor in comparison to the type of data qualifiers traditionally used. The Navy adopted the format in question because it conveys more detailed information to the reader.

The sequence of events regarding sampling were a result of effective communication between the Navy and NJDEP. Prior to issuing a formal letter, the NJDEP Case Manager telephoned the Navy Remedial Project Manager and related preliminary concerns with the sampling plan. He then faxed an advance draft of the letter. The Navy was aware of its contents and modified the sampling plan before field work commenced.

The EPA has missed the intent of NJDEP comment #5; the comment simply informs the Navy that the NJDEP "Proposed Cleanup Standards" is the appropriate regulation rather than the "New Jersey Environmental Cleanup Responsibility Act informal guidelines". The concentrations contained in the "Proposed Cleanup Standards" are based on calculated human health criteria, and utilize methods patterned in large part, on the Risk Assessment Guidance for Superfund (RAGS). One noteworthy exception is that the "Proposed Cleanup Standards" establish a risk level of one-in-one-million as a goal, rather than the range of one-in-ten-thousand to one-in-one-million that the RAGS employ. The "Proposed Cleanup Standards" have been designated as an ARAR for the ongoing Remedial Investigation at NWS Earle and referencing the objectives of that regulation in this instance is deemed appropriate. Comparing the concentrations of compounds detected to the levels specified in the NJDEP regulation in fact does constitute a risk based decision.

The field sampling plan specified that one sample be collected in each of the four fenced play areas. Locations were selected based on professional judgement of field conditions, evidence of contamination and screening with a PID. These standard practices result in submitting the most likely location for contaminated soil to the laboratory for analysis. At each location, samples were collected at two depths, 0 - 6" and 6 - 12". Analysis of sample S-13 (0 - 6") indicated detectable levels of PAH compounds. The only compound that was detected in sample SS-13 (6 -12"), collected directly below S-13, was pyrene at a concentration of 0.11 ppm. The NJDEP cleanup objective for this compound in surface soil is 1700 ppm. This data vertically characterizes the area and demonstrates that contamination diminishes rapidly with depth.

Re: SITE A - CHILD DEVELOPMENT CENTER, NWS EARLE, NJ

As part of the construction project, six inches of soil will be removed from the area where S-13 was collected. The excavated soil will be replaced with clean fill. The site conditions of the completed CDC will not pose a risk to the children using the facility.

Worker safety was taken into consideration as part of the decision to proceed with construction of the CDC. The health risk resulting from soil exposure to workers was calculated based on the concentration of contaminants found in sample S-13 and expected duration of exposure, following RAGS guidelines. The resultant risk was found to be acceptable.

It is recognized that prior concurrence by the EPA is desirable. However, Region II was not able to respond within the timeframe mandated by the construction schedule as provided in our letter of 25 February 1992. Given the fact that the site is not complex and based on our experience with conducting Site Investigations, the Navy decided to proceed with the sampling effort. Samples were collected utilizing methods and QA/QC requirements equivalent to EPA Level IV CLP Statement of Work. All data generated was validated according to the Functional Guidelines. These steps were taken to ensure that data would be legally defensible and allow an assessment of data quality at a later date.

There are currently 27 sites under investigation in the Installation Restoration Program. It is understood that the NCP mandates that a Risk Assessment be an integral part of a Remedial Investigation. The Navy is proceeding as rapidly as possible to investigate these sites and determine the risks if any, to the local population.

According to the Rare Species Survey of NWS Earle, NJ dated 15 September 1989 conducted by NJDEP, Division of Fish, Game, and Wildlife, there are no endangered species at Site A.

There are no regulated wetlands in the vicinity of the CDC.

Following are responses to the specific comments in Attachment 1:

- Appendix B can be provided, however, the data in that appendix pertains to Site A as a whole, not the specific portion that the CDC will occupy.

- Figure 2 was produced as part of an environmental impact study for an adjacent construction project. A community center and recreational facility are planned for the remainder of Site A.

Re: SITE A - CHILD DEVELOPMENT CENTER, NWS EARLE, NJ

- The area in question was investigated and determined not to be a wetland. The fence was put up to provide secure storage for construction materials used in an adjacent housing development.

- Correct units are ug/kg.

- Appendices from the Halliburton NUS letter of 1 May 1992 letter are enclosed.

If you have any questions or comments concerning this matter, please contact me at (215) 897-6280.

Sincerely,



GERALD F. HOOVER
Remedial Project Manager
By direction of the Commanding Officer

Copy to: w/o encl
NJDEP, Joseph Freudenberg
NWS Earle, Gus Hermann

Internal Copy to: w/o encl
1422/Nick Stencil
1421/Jerry Hoover