



N60478.AR.000247
NWS EARLE
5090.3a

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II

JACOB K. JAVITS FEDERAL BUILDING
NEW YORK, NEW YORK 10278

MAR 12 1993

John Kolicius
Naval Facilities Engineering Command
10 Industrial Highway
Code 1821, Mail Stop 82
Lester, PA 19113-2090

Re: Naval Weapons Station (NWS) Earle

Dear Mr. Kolicius:

The U.S. Environmental Protection Agency (EPA) received the Draft Site Investigation (SI) Report on February 8, 1993.

Enclosed are partial comments for the SI Report. In accordance with Section XVI of the Interagency Agreement, EPA is requesting an extension until April 8, 1993 for the transmittal of the remainder of the comments. I will make every effort to transmit these comments prior to that date.

If you have any questions concerning this matter, please contact me at 212-264-6609.

Sincerely yours,

A handwritten signature in cursive script that reads "Paul G. Ingrisano".

Paul G. Ingrisano
Project Manager
Federal Facilities Section

Enclosures

cc: LCDR J. P. Dell, NWS Earle
J. Freudenberg, DEPE
R. Johnson, Weston

Attachment 1

A. Air Programs

Nature and Extent of Contamination:

Metals, explosives and organics were detected in soils, sediment and groundwater in various concentrations in many of the 16 sites.

Comments:

1. An air pathway analysis should be performed to determine any possible air impacts due to organic contaminants at the site, as well as the impact of inorganics. Inorganics may contribute to the air quality since suspension of shallow soils by wind erosion and mechanical disturbances are possible.
2. Ambient air monitoring at Site 9 during intrusive activities showed the presence of VOCs. Since there is a lack of air emissions data at this time, measures must be taken to prevent possible fugitive dust emissions during any other ongoing intrusive work at other sites.

B. Environmental Impacts

EPA's comments and recommendations concerning compliance with the various environmental resource-related laws and authorities are as follows:

1. The report indicates that samples taken from drainage and/or salt marshes adjacent to Sites 6, 12, 13, 15, 17 and 23 contained low but measurable levels of contaminants, and attributes these as originating primarily from non-point sources. EPA concurs with the report's recommendation that additional background samples should be systematically obtained to help focus future evaluations on point source contamination from prior site activities. However, the additional sampling should also be used to determine whether the "ubiquitous non-point source chemicals" (p. 5-4) represent a significant threat to human health or the environment which must be evaluated and addressed on a site-wide basis. It is the significance of the threat which dictates whether additional remedial planning needs to be conducted, rather than whether or not the contamination originated from a point source.
2. EPA's previous comments on the Draft Remedial Investigation Report (see Attachment 2), for other areas of the site contained various recommendations concerning the actions that EPA believes the Navy should be taking in order to comply with various federal environmental laws and authorities. Those recommendations were intended to apply to the site as a whole; therefore, they are directly applicable to the sites evaluated in the present document as well. To date, however, EPA has not been informed

what steps, if any, the Navy is taking to ensure that it complies with these requirements.

C. National Oceanic and Atmospheric Administration (NOAA)

1. This Site's impact on aquatic habitats is of great concern due to the fact that the headwaters and portions of the drainage basins of three major Coastal Plain rivers, the Swimming, the Manasquan and the Shark, are present on the Main Base, as stated on Page 2-4 and shown in Figure 2-1. Figure 2-1 should include all of the site locations addressed in the study (Sites 13 and 25 have been omitted).

2. Page 2-6, Paragraph 2 states that, "Most of the surface drainage from the Reservation in the Chapel Hill area flows north to Sandy Hook Bay via Ware Creek (located northwest of sites 6, 12 and 17) and Wagner Creek (located east of site 9)." Section 3.1.7 discusses the surface water and sediment sampling carried out during this SI study and states that sampling for these media was carried out adjacent to sites 12, 13, 6 and 17. It is unclear why sampling in Ware Creek, adjacent to site 9, was not considered. Also, Table 3-7 presents a summary of analytical requirements for sediment and surface water and includes sampling of sites 15, 23 and 27 which were not identified as being sampled in the previous section (Section 3.1.7).

3. Though Table 3-7 noted that Sites 6 and 15 were included in the surface water and/or sediment sampling efforts, no mention of these activities were included in the individual site discussions included on Pages 3-25 and 3-26, respectively.

4. Page 5-3 discusses the ecological relevance of the surface water and sediment data collected at the individual sites. The study concludes that the contamination observed in these media "... appeared to reflect non-point source types of impact such as stormwater runoff from parking areas, equipment storage areas and buildings." The study notes there were clear exceedences of screening criteria (federal AWQC and NOAA ER-Ls were used for comparison to surface water and sediments, respectively). Averaged detected site contaminant concentrations were used; no comparison of any maximum values measured were considered. Still, clear exceedences of both screening criteria were noted. As a result, the study recommends sediments associated with sites 6, 12 and 15 be considered. Though Page 5-4, Paragraph 3 noted that sediments associated with site 17 exceeded NOAA ERLs, no recommendation to address sediment in the future is made. NOAA concurs that additional work is needed to adequately evaluate any risks posed to ecological receptors by the Site. It would be preferable to try to evaluate these risks on a site-wide basis rather than on an individual site by site basis. It is also recommended that any additional sediment sampling conducted include analyses for total organic (TOC) and grain size to ensure depositional areas where one would expect to see the contaminants accumulating are sampled. It would also be helpful to provide

additional detail on the proximity of the wetland areas to the individual sites and to the areas sampled as it is difficult to determine, from the figures included in this report, whether these areas have been properly evaluated.

Note: EPA received the Navy's response to NOAA's concerns for additional sampling on March 11, 1993, after NOAA had reviewed the SI Report. EPA has forwarded that letter to NOAA for review and comment.

Attachment 2

Environmental Impacts (§ 1-8)

1. Coastal Zones: The Coastal Zone Management Act (CZMA, 16 USC 1451) and National Oceanic and Atmospheric Administration (NOAA) Regulations on Federal Consistency with approved Coastal Management Programs (15 CFR 930) may apply for portions of NWSE. If actions considered in the draft RI/FS affect any land or water use or natural resource in the coastal zone, a determination of consistency with New Jersey's Coastal Zone Management Plan may be needed. Consultation on coastal zone issues should be initiated by contacting the New Jersey Department of Environmental Protection and Energy, Division of Coastal Resources, CN 401, Trenton, NJ 08625.

2. Cultural Resources: The National Historic Preservation Act (16 USC 470 et. seq.) is mentioned in the text and included in Table 7-2 as a site-specific ARAR. However, the status of the Stage 1A Cultural Resources Survey is not clearly presented. A Stage 1A Cultural Resources Survey should be conducted as part of the RI/FS process. Based upon the results of the 1A survey, additional work, including a 1B and Stage 2 surveys may be required. The cultural resources work should be coordinated with this office and Nancy L. Zerbe, Administrator, Office of New Jersey Heritage, CN 404, Trenton, NJ 08825.

3. Floodplains: Executive Order 11988 defines floodplains as "lowlands and relatively flat areas adjoining inland and coastal waters." Topography of portions of the NWSE fit this description, as there are numerous creeks and tributaries to the Swimming River, the Shark River and the Manasquan River within the boundaries of NWSE. Additionally, while the Flood Insurance Reference Maps for Monmouth County do not show floodplains zoning for federal properties, some of the 100 year and 500 year floodplains indicated on those maps abut on NWSE and may continue onto NWSE property. While the document states that there are few floodplains in the vicinity of NWSE, a precise delineation of potentially impacted 500 year floodplains still needs to be made. If such floodplains are identified, the potential impacts of proposed remedial actions on those areas must be assessed and avoided, minimized, or mitigated.

4. Wetlands: The topographic quadrangles covering the NWSE show numerous swamps. Moreover, individual site descriptions indicate wetlands in and adjacent to the sites. However, the documents do not provide a comprehensive analysis of potentially impacted wetlands within NWSE. All such wetlands need to be delineated using the Federal Manual for Delineating Jurisdictional Wetlands.

5. Safe Drinking Water Act: NWSE is situated in the recharge zone of the New Jersey Coastal Zone Aquifer, a sole source aquifer subject to the provisions of Section 1424(e) of the Safe Drinking Water Act. MCLs for clean-up must be the more stringent

of either Federal Safe Drinking Water Standards and the State of New Jersey standards. These regulations should be considered as chemical specific, site specific and action specific and should be listed in Tables 7-1, 7-2 and 7-3. Additionally, surface water paths of runoff from NWSE sites enter streams which feed drinking water sources. Accordingly, the impacts of the site contamination and discharges from remedial actions to these streams should be evaluated for their impact on drinking water quality.

6. Endangered Species: The Endangered Species Act of 1973 (16 USC 1531-1544) is listed as a site specific ARAR. The document references work that was done by the State concerning the swamp pink (*Helonias bullata*) which is present in major portions of Monmouth County. However, the Navy should also consider the findings and recommendations of the US Fish and Wildlife Service's (USFWS) "Swamp Pink Recovery Plan" (see Attachment 3). Additionally, as work proceeds on the selection and implementation of remedial actions, the Navy should continue to coordinate with USFWS through Mr. Clifford G. Day, Field Supervisor, US Fish and Wildlife Service, 927 North Main Street (Bldg. D), Pleasantville, NJ 08232.

7. In a related manner, the National Marine Fisheries Service (NMFS) should be contacted to determine if there are any breeding grounds or habitats for endangered marine species which might be affected by site contamination or remediation activities. Site 7 would appear to be of most interest in this regard. The endangered species consultation with NMFS can be initiated by contacting Douglas Beach, Endangered Species Coordinator, National Marine Fisheries Service, Environmental Assessment Branch, 1 Blackburn Drive, Gloucester, MA 01930.

8. Significant Agricultural Lands: The Farmland Protection Policy Act of 1981 (7 USC 4201, et. seq.) and the USDA Farmland Protection Policy (7 CFR 658) may apply to portions of NWSE. Of particular note in this regard are the cranberry bogs (which appear on the topographic maps) at the headwaters of Yellow Brook and Marsh Bog Brook that may be impacted by Site 19.

9. Reference Section: The ATSDR Toxicological Profile for Chromium, a chemical of concern at NWSE, is not included with the other ATSDR references (pp. R-4 and R-5). Also, on page R-2, an EPA personal communication is cited as coming from Region II, Philadelphia; no individual is referenced. The source of this communication should be identified and the reference corrected.

10. EPA has determined that its CERCLA/SARA remedial process is functionally equivalent with the National Environmental Policy Act (NEPA). To date, the Navy has not made such a determination about its process. Accordingly, the Navy will have to take action to ensure that its RI/FS and subsequent remedial action comply with NEPA.