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**State of New Jersey**  
**Department of Environmental Protection and Energy**  
Division of Responsible Party Site Remediation  
CN 028  
Trenton, NJ 08625-0028

Scott A. Weiner  
Commissioner

Karl J. Delaney  
Director

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

**MAY 25 1993**

Dear Mr. Kolicius:

Re: Naval Weapons Station Earle  
Colts Neck Township, Monmouth County  
Draft Site Inspection Report, February 1993

The Department has reviewed the above referenced document. The Department's comments are as follows.

Section 3

1. Section 3.1.1, p. 3-4

The Department requested that Morie sand be utilized for monitor well installation. The Navy/Weston continues to utilize Ottawa sand. A comparison chart showing grain size distributions and percentages for both Morie and Ottawa sand should be submitted to determine if the Ottawa sand pack is equivalent to the Morie pack.

Section 4

2. p. 4-1

The portion of the title for this section depicted in parentheses (i.e., Natural Chemical Components and Contaminants) is inappropriate and must be omitted. This, along with many other statements throughout the document, present an obvious bias by the contractor that elevated levels of certain contaminants are natural background levels. All such statements or premature conclusions must be omitted from the Results sections and the Findings and Recommendations sections for each site. Until the contractor provides evidence of similar levels of these constituents in off-site soil and ground water, these elevated concentrations of constituents must be treated as contamination.

3. The results of all soil samples should be evaluated by comparing data from each site to the current NJDEPE Soil Cleanup Criteria (revised 3/8/93). Ground water results should be compared to the New Jersey Ground Water Quality Standards for a Class II-A aquifer. In instances where low level hits of contaminants are infrequent and below these criteria, it is not necessary to discuss these results in the text. Also, it should be noted that the soil criteria must not be used to evaluate sediment data. Sediment data should be compared to NOAA criteria in Section 4.0 and not left for general discussion in Section 5.1.4 as a non-site specific issue. Biological Technical Assistance Group (BTAG) of EPA should be consulted to review sediment sampling results of specific sites and the overall impact evaluation.

4. There are several inconsistencies with units, numbers and constituents between the narrative evaluations and the data tables that need to be corrected/clarified.

5. It is unclear what a blank space means in data tables. Non-detect results should be reported by specifying the detection limit achieved along with a "U" qualifier.

6. Section 4.2, Site 6

The location of surface soils presented on page 4-14 is not depicted on the respective site map. The map must be revised accordingly.

7. Table 4-7, p. 4-24

Is mg/l the correct units for surface water results as shown on Table 4-7? If it is incorrect, it should be corrected.

8. Section 4.6, Site 15

The last sentence in this section is inappropriate and does not summarize the results of investigations at Site 15; this statement should be removed. Appropriate narrative needs to be added to the findings in section 5.2.6 discussing why the metals levels were elevated (i.e., result of the hydropunch sampling procedure).

9. Section 4.8, Site 17

To aid the reader, a map such as Figure 3, p. 4-13 should be included with this section.

10. Section 4.8.1.1, Site 17

The character/makeup of the fill materials must be described as was done for other landfills.

11. Section 4.9.5, Site 23

Several inorganic compounds were high in the hydropunch sample but not discussed in this summary. These results should be included.

12. Section 4.10.3, Sites 24 and 25

The summary fails to note that lead data was rejected for both these sites. It is inappropriate to draw any conclusions on these results.

13. Section 4.11.4, Site 27

The constituents discussed conflict with results shown in data tables.

14. Section 4.12.3, Site 29

Units and concentrations in the text and data tables conflict.

## **Section 5**

15. Sec 5.1.1-3, Site Groupings

The Department cannot grant final concurrence with the proposed site groupings until evaluations as described in Comment #2 are performed and until issues regarding background concentrations of metals in soils and ground water are resolved.

16. Regional maps depicting the proposed site groupings should be included in this section of the report.

17. Section 5.1.4

The Department suggests that the Navy consult with EPA's Biological Technical Assistance Group (BTAG) to determine if non-point sources may be the cause of elevated sample results.

18. Section 5.2

The Department will not concur with the recommendations presented in this section until results presented in this section are adequately analyzed. This includes comparing the results to the criteria and standards discussed in comment #2 and determining the natural background levels of inorganics in soils and ground water. The Department will require the preparation of a work plan for regulatory review for this background study.

Some examples of general concern with this section include:

- A Site 1 monitor well had elevated levels of organics, inorganics and explosives. Monitor well, in addition to the recommended soil sampling will be required at this site.

- Sites 1, 15, 17 and 23 exhibited elevated levels of metals in ground water samples. Until the Navy demonstrates that these levels represent natural background, these sites must be included as sites requiring further investigation.

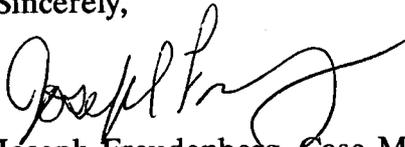
- At Site 23, in addition to the recommended analysis for VOCs and SVOCs, the Department will probably require that the significance of metals and explosives (2,4-DNT) be addressed.

- Site 27 appeared to have elevated levels of metals in the immediate area of the stockpiled sandblasting residues and the adjacent drainage swail. Further work will be required at this site.

- Site 29 had a hit of TPH in soil significantly above the current Soil Cleanup Criteria that will require further investigation.

If you have any questions concerning these comments please call me at (609) 633-1455.

Sincerely,



Joseph Freudenberg, Case Manager  
Bureau of Federal Case Management

- c. Paul Ingrisano, USEPA  
Ken Petrone, BEERA/DPFSR  
Linda Welkom, BGWPA/DPFSR