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NWS EARLE  
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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*

Mr. Brian Helland  
Northern Division  
10 Industrial Highway  
Mail Stop #82  
Lester, PA 19113-2090

**JUN 10 1993**

Dear Mr. Helland:

Re: Naval Weapons Station Earle (NWSE)  
Colts Neck Township, Monmouth County  
Incinerator Cleanup Plan

The Department has reviewed the above referenced plan and has the following comments.

**Soils**

1. The Department concurs with the approach for soil remediation at the site. However, the Navy should indicate if levels will be removed to residential or non-residential levels. If non-residential levels are utilized, use restrictions will be required.
2. Vertical and horizontal delineation of soil contamination is incomplete. This may underestimate the magnitude of the cleanup effort involved.

The plan chooses to use the fence line as the horizontal limit of contamination for surface soils. This may under or over estimate the horizontal extent of surface soil contamination. There are no sample points east of I-18, I-16, I-11, I-12 and I-14, which all showed surface soil contamination. A more definitive delineation east of the fence line is warranted prior to remediation efforts.

Vertically, samples exceeded cleanup criteria at 3 feet below ground surface, the maximum depth of any samples taken. It will necessary to take further samples to delineate the vertical extent of contamination. This can be done prior to remedial efforts or as post-excavation sampling.

3. It should be noted that N.J.A.C. 7:26D was not promulgated and is only a "To Be Considered" guidance document. It is possible that compliance criteria change as the

guidance evolves. The most current soil criteria are those listed in the March 8, 1993 NJ Soil Cleanup Criteria (attached).

#### **Ground Water**

4. Initial ground water results appear to be similar to those found at various other sites at the base. The Navy has yet to propose a method to address the presence of inorganics in numerous site wells. The Department recommends that the ground water at the incinerator area be addressed within this overall method.

In addition the Department has several site specific comments concerning ground water.

5. It appears that the contractor incorrectly transposed the elevation of MW-1 from Monitor Well Survey Form B - Location Certification to calculations used in this report. This error should be correct and necessary revisions to the report made.
6. Tables 3-5, 3-6, and 3-7

It should be noted that the cleanup standards are based on the Ground Water Quality Criteria for a Class II-A aquifer. Also, several compounds with the NA notation do have criteria promulgated and should be included.

7. To better define conditions at the furnace area the following recommendations should be included in section 3.2.4 of the report:
  - a. An additional map needs to be included in this section of the document that relates the location of Site 10, streams, and wetlands to the incinerator area. A topographic 7.5 minute series map should be evaluated when constructing these maps.
  - b. An additional round of synoptic-ground water level measurements should be taken to verify local flow gradients. Monitor wells from site 10 should be included in these measurements.

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

Sincerely,



Joseph Freudenberg, Case Manager  
Bureau of Federal Case Management

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