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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

Jeanne M. Fox  
Acting Commissioner

Karl J. Delaney  
Director

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED  
NO: B261 028 898

NOV 15 1993

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

Re: NWS Earle  
Colts Neck Township, Monmouth County  
Final Incinerator Cleanup Plan & Draft Site 20 - Soil Contamination  
Removal Work Plan

Dear Mr. Kolicius:

The New Jersey Department of Environmental Protection and Energy (NJDEPE) has reviewed the above referenced documents submitted by Halliburton NUS Corp., dated August 1993. The NJDEPE approves these plans provided the following comments are incorporated.

Incinerator Cleanup Plan

- 1) Section 3.2.4 - Groundwater level data has not been included to support Halliburton's assumption that groundwater flow does not coincide with surface topography.
- 2) A third round of synoptic water levels should be taken to confirm flow gradients. This comment was included in the June 10, 1993 letter but has not been addressed.
- 3) Tables 3.5, 3.6, 3.7 & 3.8 - The criteria listed in the cleanup standards column is still incorrect. It must be revised to reflect the currently promulgated ground water quality criteria.
- 4) It is recommended that a "Background Study" be done to determine the levels of soil and groundwater contamination in areas not affected by the base activities. This would be required to support Halliburton's conclusion that low levels of metals in soils are naturally occurring.

Site 20 - Soil Contamination Removal Work Plan

- 1) The Department suggests that the excavated soil/grit be staged in covered, roll-off containers rather than stockpiled onto a tarp. This would provide better containment of excavated soil

as well as avoiding a second effort of moving the stockpiled soil onto dump trucks.

- 2) RCRA characterization of the excavated waste must be completed in accordance with guidance provided by the Department's Waste Classification Unit, within the Bureau of Advisement and Manifest. All classification forms and directions are enclosed.
- 3) Figure 1 should be revised to show the finished dimensions of the excavation and the location of the post-excavation samples. The post-excavation sampling and backfilling shall be in accordance with the Technical Requirements for Site Remediation (N.J.A.C. 7:26E).
- 4) The Department suggests that the Navy may want to consider "soil re-use/recycling" options within the State prior to disposing of the soils at an ID-27 landfill if the waste material is classified as "non-hazardous". If the waste is non-hazardous, it must follow county waste flow requirements.

If you have any questions regarding the aforementioned comments, please contact me at (609)-633-1455.

Sincerely,



Bob Marcolina, Case Manager  
Bureau of Federal Case Management

- c. Linda Welkom, DPFSR/BGWPA w/o enclosure  
Kenneth Petrone, DPFSR/BEERA w/o enclosure  
Paul Ingrisano, EPA