



N60478.AR.000285

NWS EARLE

5090.3a

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 2112/1821/JK

MAY 03 1994

Mr. Paul G. Ingrisano, Project Manager
Federal Facilities Section, Region II
United States Environmental Protection Agency
Jacob J. Javits Federal Building
New York, New York 10275

Dear Mr. Ingrisano:

Responses to your March 18 comments on the Health & Safety Plan and the Quality Assurance Project Plan for the R.I. Work Plan For 17 Sites at NWS Earle, Colts Neck, NJ are enclosed. Responses to your April 20 letter addressing the remainder of the R.I. Workplan will be forwarded under separate cover.

I look forward to the proposed meeting to resolve any differences regarding our responses. If you have any further questions or need additional information, please call me at (610) 595-0567 ext. 157.

Sincerely,

A handwritten signature in cursive script, appearing to read "John Kolicius".

JOHN KOLICIUS
Remedial Project Manager
By direction of the Commanding Officer

ATTACHMENT A

1. GENERAL COMMENTS:

- A. "Superfund Analytical Methods for Low Concentration Water for Organic Analysis, 10/92" will be used.
- B. Although the CLP Contract Required Detection Limit for beryllium is 5 ug/L using ICP methodologies, the actual method limit is below the Drinking Water MCL of 4 ug/L. We do not agree that the additional cost of the atomic absorption furnace technique can be justified.
- C. Two surface soil samples for volatile and semi-volatile organics will be included in the vicinity of the shooting platform.
- D. At sites 24 and 25, the primary contaminant of concern is lead which we believe to be immobile. A mobility test could be performed to confirm this opinion. A removal action at this site would further minimize the chance of migration.

By taking soil borings immediately above the water table at Site 27, we expect to be able to determine if the groundwater is impacted.

Since all storage at Site L has been on the surface, it is appropriate to determine an impact to soils before any investigation of groundwater is considered.

2. MONITORING WELL CONSTRUCTION/INSTALLATION:

- A. Any impact to groundwater samples due to the use of PVC monitoring wells would tend toward false positives. Since each well is purged, any water in prolonged contact with the well is removed prior to sampling. Even though some constituents adsorbed by the PVC could leach back into the samples after purging, the economic advantages of PVC wells outweigh this disadvantage. It should also be noted that all existing monitoring wells at NWS Earle are PVC and a change to stainless steel at this stage would seem to invalidate their use.
- B. The method discussed will be implemented.
- C. Does steam cleaning need to occur on site? Could screens be cleaned off site and then wrapped for transport to the site?

D. No discrepancy exists. Although the SOP allows for less than the regionally required 2 feet of bentonite pellets, the text of the Work Plan takes precedence over any Appendices.

3. **WELL DEVELOPMENT:**

Air lifting will not be used. The text of the workplan will be amended to identify specific methods where SOPs list various options.

4. **MAJOR EQUIPMENT DECONTAMINATION:**

Does steam cleaning need to occur on site? Could well casings and screens be cleaned off site and then wrapped for transport to the site?

5. **SAMPLING EQUIPMENT DECONTAMINATION:**

A. All potable water at NWS Earle is from a treated municipal system (New Jersey American Water Co.)

B. "Demonstrated analyte-free water" will be used.

C. Ultrapure nitric acid will be used.

D. Acetone used will be pesticide grade or better.

E. The change noted will be made.

F. Statement will be removed.

G. At least 5 times the volume of solvent will be used in the water rinse.

H. Phthalate-free gloves will be utilized.

I. Methanol followed by hexane will be used and noted in the text of the work plan. The correct rinse procedures will also be specified in the text.

J. The text of the work plan will specify that braided bailing lines will not be used.

K. Pumps will not be used for sampling.

6. **SAMPLING PROCEDURES:**

Additional text will be added to specify "floor sweep" procedures.

7. **GROUNDWATER SAMPLING:**

- A. Since immiscible layers have not been detected in any previous investigations at NWS Earle, the Navy opinion is that visual inspection using a clear or opaque bailer would be more appropriate to detect any thin immiscible layers.
- B. Bailers used to purge wells will be decontaminated in accordance with work plan section 2.10.2.
- C. Rinsing with soapy water and deionized water will be specified.
- D. Dedicated tubing will be specified where appropriate.
- E. Samples will be collected as indicated in comment.
- F. Stabilization requirements will be noted in the workplan. SOP will not be changed for specific case.
- G. Teflon or stainless steel bailers will be specified.
- H. Bailer cords will be types specified in comment.
- I. VOC samples will be collected before other analytes.
- J. Sample filtering device will be in compliance with comment.
- K. Although the Navy will specify field preservation as requested, we feel that sample integrity would be better if pre-preserved sample containers were used.
- L. The first method of purging will be used as much as possible, but the water surface level may drop in low yielding wells.
- M. Pumps will not be used for sampling. The text of the work plan will note this.

8. **SURFACE AND SUBSURFACE SOIL SAMPLING:**

- A. Sample compositing is not planned.
- B. Shelby tube sampling is not planned.
- C. The use of brass liners is not planned. The work plan will be amended to identify specific procedures and implements.
- D. The method described in the comment will be implemented.

9. **TEST PIT SAMPLING:**

- A. The appropriate SOP will be submitted for review.
- B. The citation will be corrected.
- C. Test pits will be backfilled as specified in comment, if appropriate.
- D. A statement referring to polyethylene sheeting will be added.
- E. Sample compositing is not planned.
- F. The method described in comment 8D will be implemented.

10. **SURFACE WATER AND SEDIMENT SAMPLING:**

- A. PVC sampling chambers will not be used. The work plan will be amended to identify specific procedures and implements.
- B. Brass Kemmerer sampling devices will not be used.
- C. The method described in comment 8D will be implemented.

11. **QUALITY CONTROL SAMPLES:**

- A. Duplicate samples will be collected as indicated in comment.
- B. "Demonstrated analyte-free water" will be used.
- C. Rinsate blanks will be collected as indicated in comment.
- D. Trip blanks will be prepared as indicated in comment.

12. **ANALYTICAL PROGRAM:**

- A. Rinsate blanks will be collected as indicated in comment.
- B. A field duplicate of "floor sweepings" will be added.
- C. Rinsate blanks will be collected as indicated in comment 11C.

13. **SUMMARY OF ANALYSIS, BOTTLE REQUIREMENTS, PRESERVATION REQUIREMENTS, AND HOLDING TIMES:**

- A. Tables will be amended as required.

- B. A footnote will be added to tables to address the presence of chlorine.
 - C. Change will be noted.
 - D. Recommended methods will be used.
 - E. The alternative method cited in Attachment will be used for soils.
 - F. The modified method will be provided.
 - G. Explosives parameters (SW 8330) will be added.
 - H. A footnote will be added to the table.
14. **SUMMARY OF FIELD ACTIVITIES AND ANALYTICAL SAMPLES:**
Inconsistencies will be corrected.
15. **SITE 1 (ORDNANCE DEMILITARIZATION SITE):**
The text will be corrected to include TPH for groundwater. TCL organics will be added to the subsurface soil analysis.
16. **SITE 14 (MERCURY SPILL):**
The size of the warehouse floor (16,000 sq. ft.) and the lack of information regarding a specific spill site makes wipe sampling impractical.
17. **SITE 15 (SLUDGE DISPOSAL SITE):**
The text will be made consistent with the tables.
18. **BACKGROUND SAMPLES:**
The text will be corrected.
19. **REFERENCES:**
References will be added.
20. **SAMPLE SHIPMENT/CHAIN OF CUSTODY:**
 - A. Shipment will be specified as noted.
 - B. Documentation will be handled as noted.
21. **SAMPLE PRESERVATION:**
 - A. Sample containers will be handled according to protocols.

- B. SOP will be modified. NOTE: The Region II CERCLA QA Manual contains a similar reference.
- C. Although the Navy will specify field preservation as requested, we feel that sample integrity would be better if pre-preserved sample containers were used.
- D. Preservation method will be noted.
- E. Lead acetate test for sulfides will be noted.
- F. Preservative concentrations will be managed as noted.

22. **PROJECT DESCRIPTION:**

NEESA requirements will be provided.

23. **CALIBRATION PROCEDURES:**

Field equipment will be calibrated daily.

24. **DATA REDUCTION, VALIDATION, AND REPORTING:**

- A. Qualifications of personnel assigned to perform data validation will be provided. Specific names are not yet available.
- B. The noted SOPs for data validation will be used. SOPs for remaining parameters will be provided.

25. **INTERNAL QUALITY CONTROL CHECKS:**

Text will be amended.

26. **PERFORMANCE AND SYSTEM AUDITS:**

- A. Analytical services will be bid upon finalization of the work plan. Only CLP labs will be eligible for award.
- B. All labs invited to bid will be CLP labs and NEESA certified for the parameters of interest. Please clarify this comment in regard to any other needed evaluations.

TYPOGRAPHICAL ERRORS

The noted typographical errors will be corrected.

ATTACHMENT B

1. The new PEL will be referenced.
2. Documentation of equipment inspections will be included in the Health & Safety Log.
3. Section 5.3 does not allow for use of Level C if PELs or TLVs are approached. It requires retreat to an unaffected area. A statement concerning the limitations of air purifying respirators for chemicals with poor warning properties can be added to Section 6.3.2.
4. 11.6 will be modified to state that in some instances workers may not be in the immediate proximity of each other due to the size of some sites. Radio contact will be maintained.
5. A clarification of the emergency response chain of command will be added.
6. A portable eyewash will be available.
7. Site workers will be in direct radio contact with NWS Earle emergency personnel. Any necessary emergency phone calls will be made by the NWS Earle dispatcher.
8. The emergency reference will be corrected. The nearest hospital is Riverview Medical Center in Redbank, NJ. Directions will be provided.