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NWS EARLE
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State of New Jersey
DEPARTMENT OF ENVIRONMENTAL
PROTECTION AND ENERGY

CHRISTINE TODD WHITMAN
Governor

ROBERT C. SHINN, JR.
Commissioner

JUN 27 1994

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
NO: 839136439

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

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Re: Site 20 Design Submission
NWS Earle
Colts Neck Township, Monmouth County

Dear Mr. Kolicius:

The New Jersey Department of Environmental Protection and Energy (NJDEPE) has reviewed the above referenced document submitted by BCM Engineers Inc., dated May 1994. The NJDEPE approves these plans provided the following comments are incorporated.

General Comment:

- 1) The Addendum to the Incinerator Cleanup Plan or Final Cleanup Plan should have been submitted prior to the Design Report as a separate document. This way the report can be reviewed to ensure all of the NJDEPE and EPA comments have been addressed prior to the design submission.

Page Specific Comments:

- 1) Section 2.2.5 - Include in this section and any other appropriate sections that the ground water TAL metals analysis were based on unfiltered samples.
- 2) Section 4.0 - The soil removal action will occur near or around the existing wells 11 through 3. The integrity of these wells may be directly impacted by the soil excavation. BCM shall include in the design report provisions to protect these wells during the excavation.
- 3) Section 4.5.1 - While the planned locations and numbers of Post-Remediation samples is acceptable, the proposal to comply with soil cleanup criteria using "...proposed N.J.A.C 7:26D-3.3..." is not acceptable. The current compliance criteria for soils contamination is presented in the November 1993 issue of SITE REMEDIATION NEWS (see enclosed). It is not clear in the plan how BCM plans to average the post-remediation samples. Only samples from the same

excavation can be averaged. Accordingly, the samples from the circular and oval "hot spot" excavation areas (depicted on Figure 1 of Appendix B) would have to be averaged separately from the larger excavation areas. Post-remediation samples from different sampling depths cannot be averaged together. Also, based on the current compliance criteria, the "10% criteria" is no longer used. BCM must review the current compliance criteria and modify this section accordingly.

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
- 778 Kenneth Petrone, DPFSR/BEERA w/o enclosure
- Paul Ingrisano, EPA