



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II

JACOB K. JAVITS FEDERAL BUILDING

NEW YORK, NEW YORK 10278-0012

JUN 29 1994

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

Re: Biological Technical Assistance Group
Site-Specific Meeting for Naval Weapons Station Earle

Dear Mr. Koliccius:

The following comments represent the consensus of the Region II Biological Technical Assistance Group (BTAG) as discussed during the site-specific meeting of June 16, 1994 for the Naval Weapons Station (NWS) Earle site in Colts Neck, Monmouth County, New Jersey. Information presented by Navy biologists included the "Draft Preliminary List of Existing Ecological Information for WPNSTA Earle and Vicinity" and a "Draft Species List." The meeting was attended by members of the USEPA, NOAA, NJDEPE, and the Navy. Responses to previous BTAG comments (memoranda dated February 4, 1994 and March 4, 1994) were supplied by the Navy.

As presented, it appears that the ecological investigations at the site are proceeding appropriately. The BTAG had previously questioned the grouping of the 29 sites at NWS Earle (BTAG memorandum of March 4, 1994) before contaminant characterizations were completed. The Navy has grouped the sites according to the different watersheds, as shown in the figure entitled "Location of Sites Within Watersheds" in the "Preliminary List of Existing Ecological Information for WPNSTA Earle and Vicinity." Although this is an appropriate criterion for the grouping of sites, it may become necessary to rework the groupings when considering home ranges of ecological receptors during an ecological risk assessment. The Navy is interested in bringing all 29 sites to the same phase of investigation and has prepared an addendum to the current work plan for the 11 sites previously excluded from this plan.

A complete mapping of the site is currently being prepared, with overlay maps to indicate different watersheds, topography, habitats, and species. It is suggested that chemical data results also be included in an overlay map. This will display the contaminants of potential concern in relation to the different habitats and receptor species, providing a guide to potential risk at the site. After completely sampling the site

and determining the extent of contamination, Contaminants of Concern (COCs) can then be identified. When developing the list of COCs, the contaminant concentrations should be compared to appropriate guidelines. These include the freshwater sediment guidance values in the "Guidelines for the Management of Dredged Material," (Ontario Ministry of the Environment, 1988, Toronto, Ontario, Canada), the estuarine sediment guidance values in the "National Status and Trends Program Approach," (Long and MacDonald, 1993, Sediment Classification Methods Compendium) and the Ambient Water Quality Criteria for surface water contaminants (EPA 440/5-86-001, "Quality Criteria for Water"). If no guidance values are available for some contaminants, it may be necessary to conduct bioassays to determine the risk of these contaminants to ecological receptors associated with the site. This may especially be true for contaminants associated with Site 11, where ordnance activities historically occurred and endangered plant species are present. However, all sampling should be completed to first characterize the site prior to the determination of COCs.

It was suggested in the March memorandum that appropriate background sample locations be selected and sampled. Since the selection of background sample locations for this site may prove difficult, especially because some of the aquatic systems have headwaters originating on the site, the BTAG is available to accompany the Navy on a site visit to assist in determining appropriate background locations. The BTAG is also available to help choose surface water and sediment sampling locations, and to determine possible depositional areas. If it is established that contamination is potentially continuing off-site, it will be necessary to delineate the full extent of contaminant migration. This is why a phased approach of sampling is most appropriate during investigations at a large site.

It is understood that wetlands will be identified and delineated on this site. If off-site contamination can be attributed to NWS Earle activities, it will be necessary to delineate these areas as well, along with any areas that may be impacted by remedial activities. Should you require additional information concerning wetlands issues, the BTAG and/or John Cantilli of the Marine and Wetlands Protection Branch are available for assistance.

The BTAG anticipates continuing these discussions during the site visit, scheduled for July 18-19, 1994.

If you have any questions concerning this matter, please contact me at (212) 264-6609.

Sincerely yours,

Paul G. Ingrisano

Paul G. Ingrisano
Project Manager
Federal Facilities Section

cc: LCDR S. Smith, NWS Earle
R. Marcolina, DEPE