



DEPARTMENT OF THE NAVY

NORTHERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
10 INDUSTRIAL HIGHWAY
MAIL STOP, #82
LESTER, PA 19113-2090

N60478.AR.000290
NWS EARLE
5090.3a

IN REPLY REFER TO

5090
Ser 2165/1821/JK

JUL 05 1994

Mr. Paul G. Ingrisano, Project Manager
Federal Facilities Section
United States EPA - Region II
Jacob J. Javits Federal Building
26 Federal Plaza
New York, New York 10275

Dear Mr. Ingrisano:

Responses to your October 6, 1993 comments on the Work Plan for the Removal Action at Site 20 at NWS Earle, Colts Neck, NJ are enclosed. Responses to Attachment 5 of the October 6 letter addressing the Health & Safety Plan will be forwarded under separate cover.

The Work Plan will be amended to incorporate the enclosed responses and will be forwarded upon completion. If you have any further questions or need additional information, please call me at (610) 595-0567 ext. 157.

Sincerely,

JOHN KOLICIUS
Remedial Project Manager
By direction of the Commanding Officer

RESPONSES TO EPA COMMENTS ON SITE 20 REMOVAL WORKPLAN

GENERAL COMMENTS

1. Work will be performed by NWS Earle Public Works Dept. personnel under supervision of training contractor. (NWS to provide list of station personnel and name of contractor in revised plan).

SECTION C. SAMPLING AND ANALYSIS

2. A parameter table will be enclosed for each type of sample.

3. The contract for chemical analyses will specify that the lab will provide contaminant-free containers prepared in accordance with OSWER procedures. The revised work plan will identify the on-site storage location.

4. Volumes will be checked with lab.

5. The demonstrated analyte free water will be obtained from the contracted lab.

6. This site was not used for any disposal other than the subject blasting grit and contaminants associated with the paint removed by it. These contaminants would be metals and semi-volatiles. Any volatiles associated with the paint would have evaporated during drying or would have been released during the blasting process. PCB analysis will also be included to determine if recycling into asphalt mix is feasible.

The fill material will be obtained from a borrow area in a remote section of NWS Earle which has not been impacted by station operations. The proposal to sample this material for metals was to obtain a natural background level.

7. The RCRA characteristic tests are ignitability, corrosivity, reactivity and toxicity. The Toxic Characteristic Leaching Procedure (TCLP test) is used to determine toxicity.

8. A CLP participant lab for the parameters of interest will be contracted.

9. Actual sampling procedures will be identified in the revised work plan.

10. Chain of Custody forms will be obtained from the contracted lab.

11. Data validation will be performed by Halliburton NUS as part of the Phase 2 RI.

12. New Jersey Non-Residential Surface Soil Clean-up Standards and NOAA's Sediment Quality Criteria (Effects Range - Low) will be used as clean up criteria for this removal.

SPECIFIC COMMENTS

I. Objective

Elevated levels of chromium, copper, nickel, lead and zinc were found during the R.I. investigation.

The critical area is the marshy area northeast of the site which receives runoff from the site via the drainage ditch.

The amount of impacted soils to be excavated will be determined by visual observation. A significant color difference exists between the black beauty grit and the indigenous soils. All visible traces of the grit will be removed and then the soil will be sampled to determine remaining contaminant levels.

All excavated materials will be disposed in accordance with appropriate RCRA standards as determined by chemical analysis.

II. Scope of Work

A. Mobilization

Midway Road becomes Normandy Road at the intersection with Esperance Road (approximately 1/2 mile north of Site 20).

B. Excavation and Stockpiling

The amount of impacted soils to be excavated will be determined by visual observation. A significant color difference exists between the black beauty grit and the indigenous soils. All visible traces of the grit will be removed and then the soil will be sampled to determine remaining contaminant levels.

Since the extent of excavation will be determined by observation of grit mixed with the soil, the entire amount will be handled as one composite. If soil sampling after the initial excavation indicates a need for additional soil removal, this soil will be stockpiled separately.

Figure 1

The 10' diameter pile is at the southeast corner of Building 544.

Midway Road becomes Normandy Road at the intersection with Esperance Road (approximately 1/2 mile north of Site 20).

All evident blasting grit will be removed from the ground surface (the 4 shaded areas in Figure 1).

C. Sampling and Analysis

Samples will be taken at the base of excavation after removal. Both metal and semi-volatile samples will be obtained from each of 12 sampling sites.

D. Backfilling

New Jersey Non-Residential Surface Soil Clean-up Standards and NOAA's Sediment Quality Criteria (Effects Range - Low) will be used as clean up criteria for this removal.