



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 2244/1821/JPK

SEP 12 1994

Mr. Jeff Gratz, Project Manger
Federal Facilities Section
United States EPA - Region II
Jacob J. Javits Federal Building
26 Federal Plaza
New York, New York 10275

Dear Mr. Gratz:

As discussed in our telephone conversation of August 30, 1994, the Navy intends to develop EPIC Site A at Naval Weapons Station Earle. The Preliminary Assessment Addendum completed in July 1992 concluded that no further action was needed for this site but EPA concurrence has not been received.

As agreed, I have gathered all available background information on the site and a summary of this data is attached. I have also summarized Navy decisions regarding this site. 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 that reads "John P. Kolicius".

JOHN P. KOLICIUS
Remedial Project Manager
By direction of the Commanding Office

Copy to:

NJDEPE - Mr. Bob Marcolina
NWS Earle - Mr. Gus Hermann

CHRONOLOGY
"EPIC" SITE A - RAILROAD CLASSIFICATION YARD
NAVAL WEAPONS STATION EARLE
COLTS NECK, NEW JERSEY

- 1944-1987 4-track rail classification yard North of the roundhouse spur was used to stage locomotives and freight cars awaiting repair. The area between the tracks was used for open storage of rail maintenance materials (ballast stone, cinders, railroad ties) and telephone poles. Two small buildings of unknown use were erected during the 1960s and removed between January and April 1981.
- 1987-1988 Area was used for storage of building materials during construction of a 500 unit family housing development. Railroad tracks were removed. Track was recycled and ties disposed.
- 1989-1991 Fenced area left by construction contractor used for storage of recreational vehicles and other equipment for Morale, Welfare & Recreation office.
- August 1991 Master Plan for Naval Weapons Station proposes site for construction of a Child Development Center (CDC), a Community Center, and recreational facilities to support the new housing area. Due to site's previous use, a study is recommended to confirm absence of hazardous materials.
- November 1991 Recreational Site Study included soil sampling at 9 locations. Sampling was biased to potential sources of contamination. Analyses for various contaminants were based upon the assumed sources. All soil concentrations were below New Jersey Environmental Cleanup Responsibility Act (ECRA) informal guidance levels for the constituents sampled. Low levels of four Base Neutrals were found at one sample location near the proposed CDC. Removal of surface soil at that location and additional sampling in the vicinity of the CDC was recommended.
- January 1992 EPIC Site Analysis identified area as Site A. EPA requested a Preliminary Assessment (PA) at the 17 EPIC sites.
- February 1992 Navy presented results of November 1991 study and proposal for surface soil removal and additional sampling in vicinity of CDC as well as PCB sampling in the areas previously sampled. Navy stated opinion that information presented should satisfy the requirements for a PA at the site.

CHRONOLOGY
"EPIC" SITE A - RAILROAD CLASSIFICATION YARD

- March 1992 New Jersey DEPE informed Navy of disagreement concerning need for PA and provided comments on proposed sampling. Since a draft of DEPE's comments was forwarded to the Navy prior to the start of sampling, changes were made to satisfy them. DEPE also stated that the ECRA guidelines had been superseded by proposed risk-based soil standards.
- May 1992 The Navy provided results from the additional sampling. No PCBs were detected. One sample showed elevated levels of semi-volatiles in the surface (0-6") soil. Since no contamination was found in the 6-12" sample at the same location, the decision was made to remove the top 6 inches of soil in this area. 4 inches of soil was to be removed from the entire site as part of the construction project.
- July 1992 EPA provided comments regarding data useability and the Navy's plan of action.
- August 1992 The Navy responded to EPA's July comments.
- September 1992 EPA requested raw data for review of validation.
- October 1992 Navy contractor forwarded raw data. Navy forwarded Preliminary Assessment Addendum for 17 EPIC sites. No further action proposed at all sites except Site F - Roundhouse Area. Discussion of Site A included identification of objects shown in the photographs and a summary of site sampling.
- May 1993 Navy, EPA and NJDEPE project managers visited the 17 EPIC sites to review the PA Addendum. NJDEPE requested a Site Investigation at Sites L and Q, in addition to Site F. Navy agreed to study these sites. Since Site G was reactivated as a pistol range, any investigation there will be deferred until closure. NJDEPE concurred with Navy decision for no further action at remaining 13 sites.
- July 1993 EPA project manager indicated verbally that a risk analysis should be performed at Site A.
- December 1993 Navy announced plans to proceed directly to a Remedial Investigation (RI) at Sites F, L, and Q to bring them parallel with 15 sites already going to an RI. EPA comments on the PA Addendum have not been received.

Rationale for No Further Remedial Action
at Site A

1. Site history is documented by several aerial photographs. No disposal occurred at the site. Railroad tracks and items stored on site have been removed.
2. Soil samples were taken at locations biased in the field to sources of potential contamination. All analyses were found to be below New Jersey's ECRA guidance levels.
3. Upon notification by NJDEPE that the ECRA levels were no longer the appropriate guidance, analyses were compared to the new risk-based soil cleanup criteria.
4. Surface soil was removed in the one area where PAHs were found to be above acceptable NJDEPE levels. Subsurface samples showed no significant contamination.
5. Arsenic was found in all samples at levels 2 to 8 times the NJDEPE direct contact soil criteria. Since NJDEPE's criteria is based on a 10^{-6} risk, the levels found are still within an acceptable risk range according to the Risk Assessment Guidance for Superfund (RAGS). The potential for direct contact will be essentially eliminated by development of the Community Center and Recreation Complex because the entire site will be covered with clean fill and topsoil and then seeded to create playing fields.
6. Prior to construction of the Child Development Center at the western end of Site A, the health risk to construction workers was calculated using RAGS guidelines. The calculation was based on the highest levels of contamination found at the site and the expected duration of exposure. The resultant risk was found to be acceptable.