



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

DEC 17 1996

Mr. John Kolicius
Remedial Project Manager
Naval Facilities Engineering Command
Northern Division
10 Industrial Highway, Mailstop #82
Lester, PA 19113-2090

Re: EPA Comments on the Draft *Proposed Plan for Sites 4, 5, and 19*, December, 1996, for
NWS Earle, Colts Neck, New Jersey

Dear Mr. Kolicius:

In accordance with Chapter XV of the Federal Facilities Agreement (FFA) between the Environmental Protection Agency (EPA) and the Navy, EPA has reviewed the draft *Proposed Plan for Sites 4, 5, and 19* for Naval Weapons Station (NWS) Earle which was submitted to EPA on November 27, 1996. Our comments are attached.

As discussed in our meeting on December 12, 1996, we suggest that the document be split up into three separate operable unit proposed plan documents: OU-1 - Sites 4 and 5, OU-2 - Site 19, and OU-3 - Site 26. This will make the information in the plans more readable as well as more consistent with EPA's use of operable units.

If you have any questions, please call me at (212) 637-4320.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey Gratz".

Jeffrey Gratz, Project Manager
Federal Facilities Section

Attachment

cc: B. Marcolina, NJDEP
L. Welkom, NJDEP

**EPA Comments on NWS Earle's
Proposed Plan for Sites 4, 5, and 19**

PAGE COMMENT

- 3 Figures 2 and 3: Better figures should be included in the final Proposed Plans to be released to the public. Also, a figure such as the excellent photographs of each site presented at the December 12, 1996 meeting would be very useful additions.
- 5 Site 4 RI Discussion: Also mention the physical description of material excavated from the test pits in 1986. See page 7-1 of the RI.
- A table summarizing groundwater concentrations, along with applicable standards would be helpful for Sites 4, 5, and 19. Soil/sediment concentration numbers should be included for Site 19.
- 6 Site 5 RI Discussion: Describe the landfill contents found at the site.
- Site 19 RI Discussion: Sediment samples also contained very high concentrations of lead (see 1993 RI page 4-89) and cadmium (see 1986 SI page 3-43).
- Column 1, Bullet #3: Both sentences are not logical. In the first sentence, VOC's characteristics (mobility and volatility) do not suggest that they originated from "sources other than the site in question." Either the sentence should be deleted or more information should be provided indicating why other sources are being considered (and what those sources might be). In the second sentence, the appearance of breakdown products, in itself, does not indicate whether or not a source area still exists. It only suggests that the contaminants leaching from the source into the groundwater are degrading with time.
- Column 2, Bullet at top of page: A couple of sentences about background metals conditions are warranted (referencing the findings in the RI). Also state the correlation of turbidity to the metals concentrations, if any. If the Navy cannot show any correlation, then the numbers are probably not related to suspended solids.
- 7 Site 4 Risk Discussion: Also mention that vinyl chloride was only detected during the RI phase II sampling, not during any of the 3 rounds of RI phase I sampling.
- General: The Navy has done a lot of work to determine background metals concentrations and the relationship between metals and site conditions. That information (as stated in previous comment letters) should be discussed in the RI and the appropriate FSs and summarized in the Proposed Plan. No mitigating information is brought into the Proposed Plan.
- 10 Tables 1, 2 and 3: Delete "natural attenuation" from the alternative 3 title.

- 14 Site 4, Alternative 3: As discussed with the Navy, groundwater modeling should be performed to give an estimate as to how long natural attenuation should take. Parameters should be conservative.
- 15 Site 5, Alternative 3: See comment for page 14, above.
- 16 Site 19, Alternative 5: We understand that the onsite disposal alternative would include the removal of "hot spots," with the lower concentrations to be disposed of onsite. If this is correct, it should be stated in the text. The text should state that the onsite remedy would only be applicable to that material which is non-hazardous.
- 17 Column 2, ¶4: A more rigorous groundwater monitoring program would be required (initially quarterly, then semi-annually, then later annual - with reduced parameters).
- 18 Column 2, ¶3: There is nothing in the text (or in the FS) to suggest that RAOs would be met in "1.5 years."
- 19 Column 2, ¶3: See comment for page 17.
- 20 Column 1, ¶4: See comment for page 18.
Column 2, Site 19: The text should state that soil/sediment which fails TCLP (is hazardous) be taken offsite for disposal. We also suggest that hotspot areas, in general, disposed of offsite.
- 21 Column 1, ¶3: The first "5A" should be "5."
- 22 Column 1, ¶2: It is not clear from the text whether the "on-site containment cell" is at Site 19 or somewhere else. This should be clarified.
- 23 Column 2, Alternative 4: Also mention that the preferred alternative will also inhibit infiltration of groundwater through the landfill, thus, in time eliminating the groundwater contamination source.
The text should mention how long it should take for groundwater to meet ARARs (based on preliminary groundwater modeling now being performed by the Navy).
- 24 Column 1, Alternative 5: See comments for page 23 (Alternative 4), above.
Column 2, Alternative 5: It is not clear how "tree growth" will aid in meeting RAOs on a landfill cap.
Column 2, Alternative 19: There should be a caveat added to the text which states that the soil will be tested and, if found to be hazardous, will be disposed of at a permitted hazardous waste site.