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

Mr. John Kolicius
Remedial Project Manager
Department of the Navy - Northern Division
10 Industrial Highway, Mail Stop #82
Lester, PA 19113-2090

Re: Review of the Navy's Draft *Record of Decisions* (July, 1997) for NWS Earle, Colts Neck, New Jersey

Dear Mr. Kolicius:

The Environmental Protection Agency (EPA), in accordance with our Federal Facility Agreement with the Navy, has reviewed the Navy's Draft *Records of Decisions* (July, 1997) for Sites 4 and 5 (OU1) and Site 19 (OU2) at NWS Earle. Our comments, which are relatively minor, are attached.

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

Sincerely yours,

Jeffrey Gratz, Project Manager
Federal Facilities Section

Attachment

cc: B. Marcolina, NJDEP
G. Goepfert, NWS Earle

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EPA Comments on the Navy's *Records of Decision* (Sites 4, 5, and 19) (July, 1997)

Page-specific Comments

Sites 4 and 5 - OU1

Page	Comment
II-24	Table 3: Regarding the health advisory criterion, the footnote should be expanded to indicate that "A Health Advisory is a concentration of a chemical in drinking water that is not expected to cause any adverse noncarcinogenic effects for up to (some number of days or years) of exposure with a margin of safety." The footnote should be changed where appropriate to reflect the number of days corresponding to the information presented in the Table.
II-27	The discussion of the risk characterization should also indicate that the risk characterization includes a discussion of uncertainties associated with the site.
II-57	¶3: The text should state that long-term monitoring will be quarterly until such time as EPA and the Navy agree on a reduced schedule.
II-60	¶2: See comment for page II-57, above.
II-64	Table 13: The discussion of the RfDs and CPFs on this page are incorrect. Actually, we are using a risk based concentration that is developed based on calculating a concentration in a specific media (i.e., air, water or soil) that is associated with specific exposure assumptions and a specific risk level (i.e., Hazard Quotient of 1 or a Cancer Risk of 1 x 10E-6). The selection of specific exposure parameters and risk levels also contribute to the calculated concentration.
A-2	The definition in the Risk Assessment Guidance for Superfund for a Reference Dose is "An estimate (with uncertainty spanning perhaps an order of magnitude or greater) of a daily exposure level for the human population, including sensitive subpopulations, that is likely to be without an appreciable risk of deleterious effects during a lifetime."

Site 19 - OU 2

II-13	Same as comment II-24 for OU1.
II-16	Same as comment II-27 for OU1.
	The risk associated with the concentrations lead, chromium, and cadmium found in surface soils during the RI phase 1 must be included in this section.
II-24	¶1: The quantity of material to be remediated (260 cu. yds.) is mentioned for the first time. What is this number based on? The numerical cleanup goals should be stated. (If the area of contamination is very well demarcated, then remediation may easily achieve concentrations close to background .)
II-42	The discussion of the RfDs and CPFs on this page are incorrect. See comment II-64 for OU1
A-1	Same as comment A-2 for OU1.