

12-15-1998

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

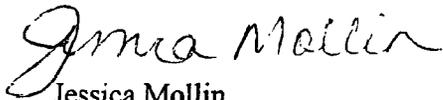
Re: Draft OU-4 ROD
Naval Weapons Station Earle, Colts Neck, NJ

Dear Mr. Kolicius:

As we recently discussed, I am forwarding to you preliminary comments on the draft OU-4 ROD. Please remember that these are preliminary comments and that more comments may be forthcoming.

If you have any questions, please call me at (212) 982-2636.

Sincerely,



Jessica Mollin
Project Manager
Federal Facilities Section

cc: B. Marcolina, NJDEP

bcc: B. Wing

EPA Comments on the Navy's draft ROD for Sites 14, 20, 22, 23, 24, 25, 27 and 29
(OU-4)

Bob Wing, Section Chief, Federal Facilities Section

- 1) Page 1-1, Statement of Basis and Purpose, Paragraph 2, Line 1. Since institutional controls are being used at some of the sites, this sentence should state that No Further Action and Institutional Controls were selected for OU-4. This should be consistent throughout the ROD.
- 2) Page 1-2, Description of the Selected Remedy. This section should include the following:
 - a) Which sites have no further action.
 - b) Which sites have institutional controls.
 - c) Which sites have groundwater action/restrictions/monitoring.
- 3) Page 1-2, Declaration Statement.
 - a) As stated above, institutional controls need to be mentioned, including which sites will have institutional controls.
 - b) Since residential standards were not met at three of the sites, the Navy needs to expand on what specific measures would be taken before these three sites could be used for residential use. For example, the Navy should include that the sites will be subject to five year reviews and that if the site ownership were transferred, deed restrictions would be required unless the sites were cleaned up to residential standards.
- 4) Page II-8, Geology and Hydrology, second paragraph. Need detailed explanation of how groundwater was presumed not to be a problem if no wells were installed at the site. Include language from page II-9, IAS, which "concludes a minimal probable impact based on the presumption that metals in paint chips would not leach to the environment."
- 5) Page II-12, top paragraph. Again, need to further discuss how groundwater was presumed not to be a problem if no wells were installed at the site. Include language from page II-13, 1995 Remedial Investigation, second paragraph, third line, "No groundwater samples were obtained because the amount of waste disposed, based on observed residues on the soil, was considered to be minimal."
- 6) Page II-16, second paragraph from the top. How many wells were screened? Where were the wells located? Which site map are the wells located on?
- 7) Page II-18, second and third paragraphs, page II-19, fourth paragraph. Page II-18, how was groundwater and surface water evaluated? Why was there no action? Page II-19, what was done with groundwater and surface water? Did risk assessment show acceptable risk?
- 8) Page II-20, second paragraph. Why were no wells installed at the site? Need explanation.
- 9) Page II-22, Geology and Hydrology, second paragraph. Again, why were no wells installed at the site. Need discussion.
- 10) Page II-24, Summary of Remedial Actions, third paragraph. Perimeter does not define the area. Include length and width.

- 11) Page II-27, Nature and Extent of Contamination. In this section, summarize remedial actions (i.e., spill cleaned up).
- 12) Page II-34, first paragraph, first line. What were the levels of lead detected at the site? Give concentrations.
- 13) Page II-35, first paragraph. What actions, if any, were taken regarding groundwater? Need explanation.
- 14) Page II-39, Human Health Risk Assessment, third paragraph. What remedial actions were taken for groundwater? Need explanation of remedial actions which were taken. If no actions were taken, provide justification.
- 15) Page II-41, Summary of Risks. What about the iron found in groundwater? Need explanation.

John Frisco, Remedy Selection Manager, Superfund

- 1) Page I-1, Statement of Basis and Purpose, second paragraph, third and fourth lines. Commas needed after (CERCLA) and (SARA).
- 2) Page II-4, Site 23: Paint Disposal Area, fourth line. Replace the word "to" with "on".
- 3) Page II-14, first line. Insert a hyphen between site and related.
- 4) Page II-28, last paragraph. Insert a hyphen between non and carcinogenic. Make this change throughout the document.

Jessica Mollin, Project Manager, Federal Facilities Section

- 1) Page II-14, fifth paragraph, fourth line. This line states "Analytical results from the 8 confirmatory samples indicated that contaminant levels in all soil samples were below regulatory cleanup levels when compared with NJDEP..... soil cleanup criteria." However, Table 19, shows that in one of the samples, benzo(b)fluoranthene, fluoranthene and pyrene all exceed the NJDEP soil cleanup criteria. This needs to be discussed.
- 2) Page II-24, last sentence on the page. This line states "Table 46 shows the results of the second round of (2) confirmatory soil samples." However, Table 46 has ten soil samples, so it needs to be clarified which are the second round of samples. Additionally, in Table 46, arsenic, beryllium, cadmium, copper, lead, antimony, selenium and thallium exceed NJDEP residential and non-residential cleanup criteria. These exceedances need to be discussed.
- 3) Many of the tables say non-residential direct contact instead of non-residential direct contact.
- 4) The shading of soil sample levels which exceed NJDEP cleanup criteria in tables is too dark and obscures the print.
- 5) Handwritten table numbers (on top of page) are hard to read.
- 6) The Declaration section of the ROD does not include Statutory determinations.
- 7) In the Decision Summary, the community participation section does not include the participation requirements of CERCLA 113(k)(2)(B)(i-v) and note that these requirements have been met.
- 8) In the Decision Summary, the Scope and Role of OU Section, does not include the removal actions that have already been taken.

- 9) In the Decision Summary, there isn't a section on Statutory determinations. This section would describe how the selected remedy meets the requirements of CERCLA 121.