



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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N60478.AR.000560  
NWS EARLE  
5090.3a

JAN 13 2000

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

Re: Navy's Response to NOAA and BTAG's Concerns on Draft Feasibility Studies for Site 13 (OU-5) and Sites 3 & 10 (OU-6), December, 1997, and the Remedial Investigation Addendum, January, 1998, for NWS Earle, Colts Neck, New Jersey

Dear Mr. Kolicius:

Attached is a response to your letter dated November, 19 1999. Included in the comments are questions which do not stem from your letter but are additional questions EPA had regarding Sites 3, 10 and 13. Furthermore, I would like to set up a visit of Sites 3, 10 and 13 in February, if possible. Bob Wing will be attending the visit with me.

If you have any questions, please call me at (212) 637-3921.

Sincerely yours,

*for*  
Jessica Mollin, Project Manager  
Federal Facilities Section

cc: B. Wing, USEPA  
B. Marcolina, NJDEP  
G. Goepfert, NWS Earle  
L. Rosman, NOAA

**EPA Comments on the Navy's Response to NOAA and BTAG's Concerns regarding OU-5 & OU-6 (November, 1999)**

Site 3

1. In Table 4-25 of the RI Addendum report, the Representative Sediment Threshold for fluoranthene is 90,005  $\mu\text{g}/\text{kg}$ . Please give further discussion of where this level came from (in addition to the explanation given in Table 2-26).
2. In the RI Addendum, page 4-59, second paragraph from the top, it is indicated that there is a "hot spot" area which contains several inorganics and PAHs. Please explain what is going to be done with this "hot spot" area. Some type of removal action, similar to the removal action at Site 13, is necessary.

Site 10

3. Site 10 contains demilitarized munitions and spent munitions cases. Does this site have UXO? Some type of historical discussion on this would be desirable, including an estimate of how many munitions are present.

Site 13

4. The Navy has acknowledged that a "hot spot" removal for PCBs is needed at Site 13. How is the Navy going to ensure that this is just a "hot spot" and that the contamination isn't extensive?
5. Please explain further why sediment/soil samples can't be taken in the forested wetlands. How deep are the leaves? Is there any type of soil/sediment between the leaves and the water?
6. Water and soil/sediment data should be compared to the most conservative screening level criteria for ecological risk assessments. For example, groundwater samples could be compared to chronic freshwater AWQC and soil samples could be compared to the Ontario Ministry of the Environment LELs and SELs.
7. As stated in the Remedial Investigation report, page 15-63, RME estimates for noncarcinogenic hazard indices associated with future industrial and future residential (groundwater) exposure scenarios exceeded 1.0. What is the Navy's proposal for this potential human health risk? Need more discussion on this issue.