



DEPARTMENT OF THE NAVY

NORTHERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
10 INDUSTRIAL HIGHWAY
MAIL STOP, #82
LESTER, PA 19113-2090

N60478.AR.000574
NWS EARLE
5090.3a

IN REPLY REFER TO

5090
Code 09TB/JK

21 MAR 2000

Ms. Jessica Mollin
Project Manager, Federal Facilities Section
United States Environmental Protection Agency
290 Broadway
New York, NY 10007-1866

Dear Ms. Mollin:

SUBJECT: DECISION DOCUMENT FOR THE REMOVAL ACTION AT THE FORMER
PESTICIDE SHOP - NWS EARLE, COLTS NECK, NJ

A Public Notice was published in the **Asbury Park Press** on February 9, 11, and 12, 2000 outlining the Navy's plan to perform excavation and removal activities at the former pesticide shop at NWS Earle. The notice announced the availability of the Action Memorandum, Engineering Evaluation and Cost Analysis for public review at the information repository. No comments were received during the public review period.

The United States Environmental Protection Agency and the New Jersey Department of Environmental Protection each provided one comment on the Navy's work plan for the subject removal action. Annotated responses to these comments are attached. Since these issues do not directly impact the proposed work, the Navy will proceed with the removal action as planned.

If you have any other questions or comments please do not hesitate to contact me at (610) 595-0567 ext. 157.

Sincerely,

John P. Kolicus
Remedial Project Manager
By direction of the
Commanding Officer

Enclosure: 1. Review Comments with Navy responses

Copy to:

Mr. Robert Marcolina, NJDEP

Mr. Greg Goepfert, NWS Earle

Mr. Mike Heffron, Foster Wheeler

**Annotated Navy Responses to
EPA and NJDEP Comments on the Navy's Remedial Action Work Plan
at the Former Pesticide Shop - NWS Earle**

EPA Comment:

Although this workplan doesn't address the remediation of groundwater, there still needs to be more discussion on previous groundwater investigations. This discussion should include more details on what the groundwater samples revealed and what the Navy plans to do in regards to further sampling and analysis of groundwater.

Reply:

A total of nine groundwater samples and one QA/QC duplicate sample were collected in preparation for this removal action. Chlordane, the principal soil contaminant at this site, was not detected above practical quantitation limits in any sample. One pesticide, endosulfan, was detected at or near the New Jersey Groundwater Quality Criteria in two samples and the duplicate. Upon completion of the proposed soil removal action, the Navy will initiate a Preliminary Assessment of the site to determine whether any further action is needed with regard to groundwater.

NJDEP Comment:

The Post-Excavation/delineation sampling results shall be compared to the Residential Cleanup Criteria. The comparison to these criteria is for the purposes of an institutional control, similar to a Deed Notice. NWS Earle has the option to clean up to either the Residential or Non-Residential Cleanup Criteria. If Earle remediates the site to Residential Cleanup Criteria, it will receive an Unconditional No Further Action (NFA). If Earle remediates the site to Non-Residential Cleanup Criteria, it will receive an NFA with a notification that this particular area is above the Residential Cleanup Criteria.

Reply:

The Post-Excavation/delineation sampling results will be compared to the Residential Cleanup Criteria. While an Unconditional No Further Action would obviously be preferred, it might not be feasible to achieve the Residential Cleanup Criteria because of historic application of these pesticides at NWS Earle. If this proves to be the case, the Non-Residential Cleanup Criteria will be used and the subsequent Preliminary Assessment will include a comparison between site-related levels and base-wide background conditions.