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NWS EARLE
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DEPARTMENT OF THE NAVY

ENGINEERING FIELD ACTIVITY, NORTHEAST
NAVAL FACILITIES ENGINEERING COMMAND
10 INDUSTRIAL HIGHWAY
MAIL STOP, #82
LESTER, PA 19113-2090

IN REPLY REFER TO

5090
Code EV21/JPK
January 22, 2001

Mr. Robert Marcolina
Case Manager - Bureau of Federal Case Management
New Jersey Department of Environmental Protection
PO Box 028
Trenton, New Jersey 08625-0028

Dear Mr. Marcolina:

SUBJECT: RESPONSES TO NJDEP COMMENTS REGARDING THE 90% DESIGN REPORT
FOR OPERABLE UNIT 6 (SITES 3 & 10)
NAVAL WEAPONS STATION EARLE, COLTS NECK, NJ

Thank you for reviewing the subject document for the Naval Weapons Station Earle. Unfortunately, there appears to have been some misunderstanding of the Navy's proposed remedy at Site 3. Inclusion of a liner component at this site would marginally increase overall protection of human health and the environment, but it would dramatically impact the cost of the project. The Navy's responses to your comments dated 05 December 2001 are attached. For your convenience, NJDEP's comments are provided verbatim, in italic font.

If you have any other questions or comments please do not hesitate to contact me at (610) 595-0567 ext. 157. We appreciate your comments and look forward to discussing our responses with you at your earliest convenience so that field work may proceed without delay.

Sincerely,

JOHN P. KOLICIUS
Remedial Project Manager
By direction of the
Commanding Officer

Enclosure: 1. Annotated Responses to Review Comments

Copy to:

Ms. Jessica Mollin, USEPA Region 2
Mr. Larry Burg, Naval Weapons Station Earle
Mr. Rick Woodworth, Foster Wheeler Environmental Corp.
Ms. Michele DiGeambeardino, EFA Northeast

NJDEP Comments on the 90% D sign Report for Operable Unit 6

Comment 1: *The capping system designed for the Site 3 landfill is not as stringent as the capping system designed for the Site 10 landfill. Although waste that was disposed of in the Site 3 landfill was composed of organic hazardous materials, the Site 3 landfill capping system does not include a drainage layer, synthetic liner or gas ventilation system. The Site 3 landfill capping system includes 36 inches of soil and 6 inches of topsoil. Therefore, it is recommended that the capping system for Site 3 be upgraded to include a liner, drainage layer and a gas venting system similar to Site 10.*

Response: The Navy disagrees with a major point in this comment. Initial indications were that domestic and industrial wastes were commingled at this site, but subsequent investigations concluded the vast majority of the fill material was domestic trash. Organics detected in groundwater were either below applicable cleanup standards (2-butanone, gamma-chlordane) or attributed to laboratory contamination (xylene, acetone). Fill material was not in contact with groundwater and no significant organic source areas were discovered.

Based on these findings, the Navy proposed the limited action of additional soil cover and re-grading. The primary goal of this cover is to promote runoff versus infiltration through the fill materials while also protecting against erosion. NJDEP's recommended upgrade would dramatically increase capital costs without any corresponding increase in protection.

The Navy proposed the more stringent capping system at Site 10 because the existing cover was minimal and the more stringent system could be installed without impact to an adjacent stream and wetlands or encroachment onto an adjacent rail line. A limited soil cover would need to extend further beyond the filled area to be effective and would impact one or more of these features. The incremental cost difference was also not as great at this smaller site, particularly if wetlands mitigation was needed.

Comment 2: *The liner anchor designs are too short and does not cover three sides of the anchor. The landfill liner should be designed based on NJDEP Solid Waste Regulations.*

Response: NJDEP Solid Waste Regulations will be reviewed and the anchor designs will be revised accordingly.

Comment 3: *All modified wells must be re-surveyed by a NJ licensed land surveyor upon completion. This new information must be tabulated along with the old survey information and as-built construction details for submission in any future monitoring O&M reports.*

Response: All modified wells will be re-surveyed and the information tabulated as requested.