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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 1824/JPK  
10 April 2001

Ms. Jessica Mollin  
Project Manager  
Federal Facilities Section  
U.S. Environmental Protection Agency Region 2  
290 Broadway  
New York, New York 10007-1866

Dear Ms. Mollin:

SUBJECT: RESPONSE TO USEPA COMMENTS REGARDING THE LONG TERM  
MONITORING WORK PLAN FOR OPERABLE UNIT 2 (SITE 19),  
AND THE PRELIMINARY ASSESSMENT/SITE INVESTIGATION  
WORK PLAN FOR SITES 47, 48, AND GUADALCANAL ROAD  
NAVAL WEAPONS STATION EARLE, COLTS NECK, NJ

Thank you for reviewing the subject documents for the Naval Weapons Station Earle. The Navy's response to your comments dated 31 January 2001 and 27 February 2001 are attached. For your convenience, USEPA'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. Koliccius  
Remedial Project Manager  
By direction of the  
Commanding Officer

Enclosure: Annotated Responses to Review Comments

Copy to:

Mr. Greg Goepfert, Naval Weapons Station Earle  
Mr. Robert Marcolina, NJDEP  
Mr. Chris Kerlish, EA Engineering

### Comments on the Long Term Monitoring Work Plan

Comment: *Figure 1 is difficult to read and the top portion of Figure 3 is too light to read, better copies of the maps are needed.*

Response: More clear copies of the maps will be provided in the Final Long Term Monitoring Work Plan.

Comment: *Section 4.1.1, page 5, refers to Section 3.2. There is no Section 3.2 in the document.*

Response: The reference in Section 4.1.1 is incorrect, and should read "...for the wells identified in Section 4.1.2."

### Comments on the PA/SI Work Plan

Comment: *The highlighted area in Figure 1 is hard to see, a better copy or a different map is needed.*

Response: A clearer version of Figure 1 will be included in the final Work Plan.

Comment: *Page 2, Section 1.2.2 - Based on the size of the Mine Battery Disposal Area, one surface and one sediment sample from the Mine Brook doesn't seem to be adequate.*

Response: One surface water sample and one sediment sample were obtained during the 1995 Remedial Investigation (prior to discovery of this site) as part of a basewide watershed sampling event. Data from these samples will be evaluated during the PA/SI along with new data. The workplan will also be modified to propose a total of 2 sediment and 2 surface water samples to assess the potential for impacts to the Mine Brook watershed. One sample set will be obtained from the tributary exiting the pond and another sample set will be obtained downstream of the confluence of this tributary with Mine Brook.

Comment: Page 4, Site History - Pesticide Shop - More historical information is needed (i.e., what the pesticide shop was used for, when it was in operation, and what the basis was for choosing certain areas for a removal action). Mine Battery Disposal Area - again, more historical information is needed (i.e., what was disposed of in this area besides mine batteries, when did disposal activities take place).

Response: The pesticide shop was a 12 x 28 foot concrete block building used as a storage and mixing facility during the 1980s. A 10 x 14 foot concrete pad outside the building was used for rinsing of spray equipment and empty containers. Rinsate may have been dumped or sprayed on the ground outside the building. All remaining pesticides and herbicides were removed from the building in 1991 and disposed as hazardous waste when the Station switched to contractor-provided pest management services.

Soil samples were taken near the concrete pad in 1998 when a residual pesticide odor was detected during wet weather. Elevated levels of chlordane, DDT, and its breakdown products were found in surface soils but decreased rapidly with depth, so a surface soil removal action was initiated. Demolition of the building and removal of an associated septic system were also completed at this time so it could be determined if soils underneath the shop or adjacent to the septic system were impacted. Section 2.2 will be revised to include this information.

With regard to the Mine Battery Disposal Site, the information provided in the Work Plan represents the sum of current knowledge regarding the site. When the batteries were first discovered, the equipment operator was called to see if he could shed any light on the disposal. He recalled that the batteries were dumped there sometime in the 1970s, but he couldn't remember many details. To the best of his knowledge, nothing else was disposed in this area. The purpose of the PA/SI is to obtain additional information, such as the extent of disposal activities, etc.

Comment: General comment - the workplan is lacking in background information and on forthcoming work to be carried out at the sites.

Response: Additional background information will be added where available, but the available information is very limited. Forthcoming work beyond what is presented in the workplan is dependent upon initial findings during the investigation.

Comment: *EPA's PA and SI Guidance should be used as a resource in the preparation and execution of the PA/SI workplan.*

Response: This guidance will be consulted throughout the project.

Comment: *The term PA/SI is only applicable for Site 48, the Mine Battery Disposal Area. This is the only site in the workplan which has not been previously investigated.*

Response: The Navy disagrees with this assertion. While samples were obtained in the other areas, they were limited to those necessary to delineate and confirm completion of removal activities. This data will be used in the PA/SI along with data obtained during the proposed field work to determine what further actions or investigations may be required.

Comment: *A good site plan figure for Site 48 needs to be included in the workplan.*

Response: A base map for Site 48 currently being prepared, and will be included in the Final PA/SI Work Plan. It should be noted that an accurate depiction of the site cannot be truly made until some of the subsurface investigation is completed and the extent of the impacted area is determined.

Comment: *More information needs to be included regarding Site 48. Specifically, what the area is comprised of and its proximity to other sites or targets.*

Response: As noted above, the information provided regarding historical activities in the area of Site 48 is the sum of current knowledge. Additional location information relative to other areas, as well as a brief description of the topographic features of Site 48, will be provided in the final workplan. The nearest other identified sites to Site 48 are EPIC Sites I, J, and K which are approximately  $\frac{1}{4}$  mile away. EPA and NJDEP concurrence for No Further Action at these sites was received in 1994 after a Preliminary Assessment. The nearest active sites are approximately 2 miles away on the other side of Route 34.

Comment: *The amount of samples planned to be taken at Site 48 are extremely limited and may be insufficient to characterize the site.*

Response: The number of samples indicated in the PA/SI Work Plan is intended to reflect a minimum number of samples necessary to assess the extent of mine battery disposal and the impact (e.g., presence or absence of leaching) associated with them, rather than fully characterize Site 48. Additional samples may be selected during the field investigation for analyses based on the presence of mine batteries, stressed vegetation, etc. However, site characterization would be performed during a subsequent Remedial Investigation, if necessary. The test pits included in the scope of work are intended to focus sampling towards areas where mine batteries are present. In addition, because the pond covers most of Site 48, we anticipate that up to 3 sediment and 3 surface water samples may be required to permit adequate site investigation.