



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

N60478.AR.000626
NWS EARLE
5090.3a

JUL 25 2001

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

Re: Identification of new Operable Unit (PCE plume located at site 26, OU-3), NWS Earle, Colts Neck, New Jersey

Dear Mr. Kolicius:

In accordance with Chapter XI (Records of Decision and Plans for Remedial Action) of the Federal Facilities Agreement (FFA) between the Environmental Protection Agency (EPA) and the Navy, the Navy needs to address the PCE plume discovered at Site 26 (OU-3) as a new operable unit (not as part of OU-3) and ultimately produce a Record of Decision for this OU. It is appropriate to consider this PCE plume as a new OU for three reasons:

- PCE concentrations above MCLs
- PCE plume appears to come from a different source at Site 26 than the TCE/DCE plume
- Large size of the second plume

Per our conversation on July 16, 2001, the Navy's opinion that expanded monitoring and use restrictions is an appropriate remedy for this OU does not seem unreasonable. Nevertheless, we need to document that other remedial alternatives have been considered before reaching any final determination. As previously discussed, the Groundwater Plume Delineation for Air Sparging/Soil Vapor Extraction Design report for Operable Unit 3, Site 26 (April, 2000), can be viewed as an equivalent to a Remedial Investigation (RI) for this new operable unit. However, in addition to the RI, a Feasibility Study (FS), Proposed Plan and Record of Decision will need to be developed, and public comment conducted. An abbreviated, "focused," FS (in which a limited number of alternatives are presented) may be appropriate for this OU; among the alternatives that should be considered are: 1) No Action, 2) Monitoring and Use Restrictions, 3) at least one Action Alternative. The final selection of any remedy by the Navy will, of course, be subject to public comment and state concurrence, in addition to EPA.

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

Sincerely,

Jessica Mollin, Project Manager
Federal Facilities Section

cc: B. Marcolina, DEP
L. Jargowsky, RAB Co-chair
G. Goepfert, Navy - Earle