



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II
290 BROADWAY
NEW YORK, NEW YORK 10007-1866

SEP - 5 2001

Mr. John Kolicius, Project Manager
Naval Facilities Engineering Command
10 Industrial Highway, Mail Stop 82
Lester, PA 19113-2090

Re: Record of Decision for Sites 3 and 10 (Operable Unit 6)

Dear Mr. Kolicius:

As we have already discussed, attached are EPA's comments on the above referenced document. If you have any questions, please contact me at (212) 637-3921.

Sincerely,

A handwritten signature in cursive script that reads "Jessica Mollin".

Jessica Mollin, Remedial Project Manager
Federal Facilities Section

Attachment

cc: G. Goepfert, Naval Weapons Station Earle
B. Marcolina, NJDEP

Comments on Record of Decision - OU-6

1. Page II-17, first paragraph. Provide further explanation as to why arsenic was found at an elevated level of 0.37 ppm (i.e., unfiltered sample). Also, include that arsenic was found at a level of .015 ppm (this is in Table 5 but is not stated in the text).

2. Explain why a low-permeability cap is being used for Site 10 versus a soil cap for Site 3.

3. Page II-24, Figure 9. Sample location MW3-04 is missing.

4. Please provide the following:

- an aerial view map for Site 10 with sample locations with exceedances (similar to Figure 9)
- a cross-sectional view of the soil cap for Site 3 (similar to Figure 13).
- a table for the occurrence and distribution of organics in groundwater for Site 3
- a table for the occurrence and distribution of organics in groundwater for Site 10

5. Page II-13, Figure 6, this map has no groundwater contours, there is no purpose for this map.

6. Page II-53, third paragraph. This paragraph states that the RAOs would be fully achieved in one year (design and installation of the vegetative cover, implementation of the CEA). The goal of the RAO should be reaching cleanup levels (i.e., MCLs), not design and construction of the remedy nor implementation of the CEA. Please change this paragraph accordingly.

7. Explain why organics weren't a problem at Site 10 (i.e., issue of lab contamination).