



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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NWS EARLE
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Mr. Robert F. Lewandowski, P.E.
Head, Restoration Delaware Valley Branch by direction
of the Commanding Officer
Department of the Navy
Engineering Field Activity, Northeast
Naval Facilities Engineering Command
10 Industrial Highway
Mail Stop, 82
Lester, PA 19113-2090

NOV 05 2002

Re: Draft Proposed Plan Site 13, Naval Weapons Station Earle

Dear Mr. Lewandowski:

I have reviewed the draft Proposed Plan for Site 13, OU 5, dated September 2002, and have provided the following comments. Please review these comments and incorporate the appropriate changes in the Proposed Plan. Once these comments are addressed the Navy can proceed to finalize the Plan.

Should you have any further questions, please contact me at (212) 637-4432.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Pocze".

Douglas M. Pocze
Remedial Project Manager

Comments - Proposed Plan Site 13
Naval Weapons Station Earle, Colts Neck, NJ

1. A description of the landfill must contain additional details e.g., size of the fill material, area of the unit, acreage, etc. Include a description as to the nature of the fence which appears to be located within the landfill. This should be done at the end of page 2 or early page 3.
2. Pg 3, IAS Results. Please replace the last sentence with the following: "No sampling was performed under the IAS investigation"
3. Page 3, SI Results. The paragraph includes qualitative results for soil and surface water, but not sediments. Another sentence should be added with this information.
4. Page 4, Groundwater Modeling. The section indicates that groundwater contamination is expected to diminish over time based on computer modeling and, thus, an active groundwater remedy is not warranted. Has this model been reviewed by EPA and DEP?
5. Page 5. The document indicates that cancer risks exceed the 10^{-4} level and non-cancer risks exceed an HI of 1. Please include the actual calculated numerical values corresponding to the various scenarios. For example, how much higher than 10^{-4} or an HI of 1 are the risks?
6. Page 6. The RI concluded that the sediment are acceptable from an ecological risk perspective except for PCBs. What will occur with these PCB-contaminated sediments? Will it be removed and placed under the cap as part of the remedy. Further detail is required.
7. Page 8, Alternative 2. What specific land use restrictions will there be other than the groundwater? Other applicable restrictions could be: prohibiting vehicular traffic, digging or excavation, general access etc. Please re-evaluate the use restrictions.
8. Page 8 & 9, Alternative 3. Does the cost estimate of the cover system include clearing and grubbing activities? Also why is vehicular traffic and excavation activities identified as restrictions for Alternative 3, but not Alternative 2?
9. Page 11, Implementability. Please indicate the acreage of the landfill.
10. Page 11, Preferred Alternative. Please change the wording of "The Navy, with EPA and NJDEP, has selected Alternative 3" to "The Navy, with EPA and NJDEP has proposed Alternative 3 as its selection of the preferred alternative." Also change the 3rd sentence to "The Navy, EPA and the state propose Alternative 3."
11. The groundwater remedy is no action along with monitoring and establishment of a CEA. The remedy is based on computer modeling indicating that the groundwater contaminants

will attenuate if the source is cut off. This modeling may have been found acceptable; however, I can't find concurrence of this modeling in any records. Please provide this information.

12. As you are aware there has been an on-going dispute between EPA and DoD regarding implementation of institutional controls. This remedy clearly relies on such implementation and enforcement of the institutional controls to be protective. Therefore, it would be appropriate to include the current language regarding implementation of institutional controls within the alternatives.

11/11/02

Reply to EPA
Comments - Proposed Plan Site 13
Naval Weapons Station Earle, Colts Neck, NJ

1. A description of the landfill must contain additional details e.g., size of the fill material, area of the unit, acreage, etc. Include a description as to the nature of the fence, which appears to be located within the landfill. This should be done at the end of page 2 or early page 3.

Reply: The additional details requested have been added to the beginning of page 3. A note has been added to Figure 5 to clarify that this fence will be moved (DPDO operations will no longer be performed over the former landfill) as part of the preferred alternative.

2. Pg. 3, IAS Results. Please replace the last sentence with the following: "No sampling was performed under the IAS investigation"

Reply: The text has been changed as requested.

3. Page 3, SI Results. The paragraph includes qualitative results for soil and surface water, but not sediments. Another sentence should be added with this information.

Reply: Details of sediment contaminants have been added.

4. Page 4, Groundwater Modeling. The section indicates that groundwater contamination is expected to diminish over time based on computer modeling and, thus, an active groundwater remedy is not warranted. Has this model been reviewed by EPA and DEP?

Reply: This section has been corrected. The ECT ran groundwater model performed and presented in the FS predicts that COC concentrations at a potential downgradient (surface water stream) exposure point selected would be lower than NJDEP and other water quality guidelines. This is the only model submitted for review by EPA and New Jersey DEP. Reference to qualitative discussions from the Fate and Transport section of the RI, predicting a gradual decrease in groundwater COC concentrations from natural effects over time, has been removed.

5. Page 5. The document indicates that cancer risks exceed the 10^{-4} level and non-cancer risks exceed an HI of 1. Please include the actual calculated numerical values corresponding to the various scenarios. For example, how much higher than 10^{-4} or a HI of 1 are the risks?

Reply: Potential carcinogenic and noncarcinogenic risks from the HHRA have been added.

11/11/02

6. Page 6. The RI concluded that the sediment is acceptable from an ecological risk perspective except for PCBs. What will occur with these PCB-contaminated sediments? Will it be removed and placed under the cap as part of the remedy. Further detail is required.

Reply: Under the proposed preferred remedial alternative, impacted soils and sediments near current erosion areas would be excavated and placed within the area to be capped.

7. Page 8, Alternative 2. What specific land use restrictions will there be other than the groundwater? Other applicable restrictions could be prohibiting vehicular traffic, digging or excavation, general access etc. Please re-evaluate the use restrictions.

Reply: Access restrictions for alternative 2 have been modified to be similar to those identified for Alternative 3.

8. Page 8 & 9, Alternative 3. Does the cost estimate of the cover system include clearing and grubbing activities? Also why is vehicular traffic and excavation activities identified as restrictions for Alternative 3, but not Alternative 2?

Reply: Alternative 3 includes an estimated cost for clearing and grubbing approximately 2.1 acres.

Access restrictions for alternative 2 have been modified to be similar to those identified for Alternative 3.

9. Page 11, Implementability. Please indicate the acreage of the landfill.

Reply: The estimated former landfill area (1.7 acres) has been added.

10. Page 11, Preferred Alternative. Please change the wording of "The Navy, with EPA and NJDEP, has selected Alternative 3" to "The Navy, with EPA and NJDEP has proposed Alternative 3 as its selection of the preferred alternative." Also change the 3rd sentence to "The Navy, EPA and the state propose Alternative 3."

Reply: the requested changes have been made.

11/11/02

11. The groundwater remedy is no action along with monitoring and establishment of a CEA. The remedy is based on computer modeling indicating that the groundwater contaminants will attenuate if the source is cut off. This modeling may have been found acceptable; however, I can't find concurrence of this modeling in any records. Please provide this information.

Reply: The section describing the groundwater model results has been revised to reflect the model discussed in the FS. That is the only model submitted to and reviewed by the EPA and other reviewers (see reply to EPA comment Number 4 for more information).

12. As you are aware there has been an on-going dispute between EPA and DoD regarding implementation of institutional controls. This remedy clearly relies on such implementation and enforcement of the institutional controls to be protective. Therefore, it would be appropriate to include the current language regarding implementation of institutional controls within the alternatives.

Reply: At this time, no standard language has been agreed upon between the Navy and EPA to place in this document.