



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

OCT 14 2003

Ms. Michelle DiGeambardino, Project Manager  
Naval Facilities Engineering Command  
10 Industrial Highway, Mail Stop 82  
Lester, PA 19113-2090

Re: Proposed Plan for Sites 1 and 11 (Operable Unit 8)

Dear Ms. DiGeambardino:

Attached are EPA's comments on the above referenced report. 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: R. Marcolina, NJDEP  
L. Burg, Navy-Earle

## Comments on Draft Proposed Plan - OU-8

1. Provide a map of ESQD arcs.
2. Page 5, 2<sup>nd</sup> column, 3<sup>rd</sup> paragraph, quantify the levels of 2,4-dinitrotoluene and RDX which were found.
3. Page 6, 1<sup>st</sup> column, 1<sup>st</sup> paragraph, explain what a confirmation study is.
4. Page 6, 2<sup>nd</sup> column, 1<sup>st</sup> paragraph. Further explain why soil wasn't sampled due to the close proximity of the water table.
5. Page 8, 1<sup>st</sup> column, 4<sup>th</sup> paragraph, EPA disagrees with the Navy's characterization that 5.6E-04 is at the upper end of the acceptable risk range. It's closer to 1 in 1,000 than 1 in 10,000. It would be preferable to indicate that the risk slightly exceeds the upper end of the acceptable risk range.
4. Page 8, 2<sup>nd</sup> column, 1<sup>st</sup> paragraph, explain the extent to which non-carcinogenic HIs associated with future industrial and future residential exposure scenarios exceed 1.0.
5. Page 9, Ecological Risks, give some quantitative information on ecological risks.
6. Page 11, 1<sup>st</sup> column, last paragraph, Long-Term Monitoring. Add to the end of first sentence, "until groundwater reaches MCLs".
7. Page 11, 2<sup>nd</sup> column, 4<sup>th</sup> paragraph, last sentence, explain how metal contaminants decrease through precipitation.
8. Page 12, 1<sup>st</sup> column, 2<sup>nd</sup> paragraph. Institutional controls also need active monitoring and enforcement by the Navy. Provide a Land Use/Institutional Control plan.
9. Page 12, 1<sup>st</sup> column, 3<sup>rd</sup> paragraph, the last sentence should read "The collected data would be evaluated during the 5-year reviews until MCLs are met."
10. For both sites some form of Institutional Controls for UXO seems necessary since these were UXO decommissioning sites.