



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

NOV 4 2003

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

Re: Record of Decision for Operable Unit 5, Site 13

Dear Ms. DiGeambardino:

Attached are EPA's comments on the above referenced report. In particular, the ROD needs to be revised to be consistent with the Navy Land Use Control Principles recently agreed to between DOD (Navy) and EPA. 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 Record of Decision - OU-5**

1. Page 1-3, Jane Kenny is the Regional Administrator not the Acting Regional Administrator.  
2. The ROD objectives are not clear and are not consistent throughout the document. For example, access restrictions are mentioned on pp I-2 and II-40, but on page II-41 a restriction for untreated groundwater is mentioned. In addition, more details regarding restrictions are needed when explaining the objectives of the ROD. It is suggested that the following be added to Section VII of the ROD:

- a) Prohibit digging into or disturbing the existing cover or contents of the landfill.
- b) Prohibit residential development on the sites.
- c) Prohibit use of the aquifer groundwater beneath the sites other than for environmental monitoring and testing until the groundwater meets New Jersey groundwater standards.
- d) Add "until groundwater is restored" to the end of the first sentence of the second paragraph.

3. Page I-2, paragraph #2. The Station Master Plan should use the same language for objectives as in comment #2 above (i.e., same objectives as the ROD).

4. To be consistent with the Navy's LUC principles, additional discussion is needed regarding land use controls (LUCs), the following information should be included in the ROD:

- a) Document risk exposure assumptions and the reasonably anticipated land uses;
- b) Generally describe the LUCs and the logic for their selection;
- c) State the LUC performance objectives;
- d) List the parties responsible for implementing, monitoring, reporting on, and enforcement of the LUCs;
- e) Provide a description of the area/property covered by the LUCs (should include a map);
- f) Provide the expected duration of the LUCs; and
- g) Refer to the Remedial Design or Remedial Action Work Plan for LUC implementation actions, since these details may need to be adjusted periodically based on site conditions and other factors.

5. Page I-2, Section IV, #2. Replace this paragraph with the following: A Land Use Controls Implementation Plan (LUCIP) will be incorporated into the Base Master Plan to limit future uses of the site to prevent disturbance of the landfill cover system or direct contact with contaminated media, prevent residential development of the site and prohibit groundwater use. Add paragraph #4 (CEA) to the end of this paragraph and re-number paragraph #5 (groundwater monitoring) as #4.

6. Page 1-3, 2<sup>nd</sup> paragraph. The first sentence of this paragraph, should be replaced with the following two sentences: "The remedial action objective (RAO) for restoration of groundwater at Site 13 will not be immediately achieved. Groundwater use restrictions will prevent potential human exposure to metals and organic compounds in groundwater until groundwater restoration is achieved."

7. Page II-7, last paragraph, explain the difference between public water supplies and domestic water supplies, if any, or use consistent terminology, if there are none.

8. Page II-9, IAS and SI Results. Discuss the 1986 Site Investigation and explain what a confirmation study is and why it was not done.

9. Page II-9, Phase I Remedial Investigation, 2<sup>nd</sup> sentence. Replace "Remedial" with the word

“Site”.

10. Page II-12. Give summary/range of data and cite references for levels of contaminants found during the Phase I and II RI and RI Addendum.

11. Tables 1-5, label these tables as from Phase II RI to distinguish them from the SI and Phase I RI.

12. Page II-20, A summary of where contamination was found or wasn't found would be helpful (i.e., groundwater contamination was or wasn't (e.g., hot spots or sporadic hits) found in a defined plume).

13. Page II-23, Remedial Action Objectives. There should be an RAO to restore groundwater.

14. Page II-26, 2<sup>nd</sup> paragraph, first sentence. Replace “Institutional” with “Land Use”.

15. Alternative 3 is missing language regarding land use restrictions. Include the same language from Alternative 2 regarding land use restrictions into Alternative 3.

16. Page II-40, Fences are included as part of the remedy, signs should be also.

17. Page II-41, 1<sup>st</sup> paragraph. Add the following sentence to the end of the paragraph:

“Residential development will be prohibited.”

18. Remove Appendix D. Submit Land Use Control Implementation Plan with the information outlined in the Navy's LUC principles.