DEPARTMENT OF THE NAVY
ENGINEERING FIELD ACTIVITY, NORTHEAST
NAVAL FACILITIES ENGINEERING COMMAND
10 INDUSTRIAL HIGHWAY
MAIL STOP, #82
LESTER, PA 19113-2090

IN REPLY REFER TO
5090
Code EV21/MD
August 3, 2004

Mr. Robert Marcolina
Remedial Project Manager
State Department of Environmental Protection
Division of Remediation Support
PO Box 028
Trenton, NJ 08625-0028

Dear Mr. Marcolina:

SUBJECT: SITE 26, OPERABLE UNIT (OU-3), EXPLOSIVE 'D' WASHOUT AREA NEAR BUILDING GB-1; NAVAL WEAPONS STATION EARLE, COLTS NECK, NEW JERSEY

The Navy has done an optimization study of Site 26 and has concluded, based on the available monitoring and cost data for the Site 26 remediation program, that operation of the Air Sparging/Soil Vapor Extraction (AS/SVE) system no longer represents the most cost-effective method for achieving further reductions in groundwater concentrations necessary to achieve the Remedial Action (RA) Objectives for Site 26. The latest available monitoring report indicates that volatile organic compounds (VOC) mass recovery is no longer measurable and the cost per pound of VOC mass recovered has increased significantly. In addition, groundwater-monitoring data indicate that concentrations are generally reaching asymptotic levels. Therefore, an alternative approach should be pursued. Specifically, as specified as part of the remedial alternative selected in the ROD, the Navy would like to propose monitored natural attenuation (MNA) for the remainder of the contaminant plume remaining above ground water quality standards (GWQS) once extracted VOCs reach asymptotic levels.

Under contract to the Navy, Battelle performed an optimization study of Site 26. The Navy recommends the following optimization steps as proposed in the *Optimization Study Report for Site 26, Operable Unit 3 (OU-3) Explosive "D" Washout Area Near Building GB-1; NWS Earle, Colts Neck, NJ*, Battelle, June 18, 2004 (Enclosure 1):

- Shut down AS/SVE system and allow groundwater mounding caused by AS operation to subside and groundwater flow conditions to return to unstressed conditions.
- Confirm stead-state groundwater flow pattern.
- Identify key existing monitoring wells and locations for new monitoring wells, if any, to fill data gaps based on unstressed groundwater flow patterns.

- Monitor groundwater quality quarterly in key monitoring wells for evidence of rebound or attenuation. Data collection should include parameters for assessing in situ anaerobic degradation potential (e.g. dissolved oxygen, redox potential, sulfate, nitrate, oxygen, iron, manganese).
- Based on four quarters of post-shutdown monitoring, demonstrate plume stability.
- Apply for a New Jersey groundwater classification exception area.
- Develop a contingency action plan in the event that post-shutdown monitoring does not show continued reductions in VOC concentrations.

The Navy looks forward to hearing from you based upon our proposed recommendations.

If you should have any questions, please contact Michele DiGeambeardino at (610) 595-0567 extension 117.

A concurrence letter would be appreciated if there are no further questions.

Sincerely,

Michele DiGeambeardino

MICHELE DIGEAMBEARDINO
Remedial Project Manager
By direction of the
Commanding Officer

Copy to:
J. Mollin, USEPA
A. Hartmann, NWS Earle