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NWS EARLE
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LETTER REGARDING THE SUBMITTAL OF THE NEW JERSEY DEPARTMENT OF
ENVIRONMENTAL PROTECTION AND U S EPA REGION 2 COMMENTS ON THE DRAFT
SAMPLING AND ANALYSIS PLAN FOR SITE 7 GROUNDWATER SAMPLING NWS EARLE
NJ
7/1/2009
TETRA TECH



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PHIL-23064

July 01, 2009

Project Number 00573

Naval Facilities Engineering Command Mid-Atlantic
Northeast IPT
9742 Maryland Avenue
Norfolk, Virginia 23511-3095

Attn: Mr. Roberto Pagtalunan, P.E.

Reference: CLEAN Contract No. 62472-03-D-0057
Contract Task Order (CTO) No. 059

Subject: Submission of Responses to NJDEP and EPA Comments on the
Draft Sampling and Analysis Plan for Site 7 Groundwater Sampling
Naval Weapons Station Earle, Colts Neck, New Jersey

Dear Mr. Pagtalunan:

Tetra Tech NUS, Inc. (Tetra Tech) is pleased to submit the enclosed Responses to NJDEP and EPA comments on the Draft Sampling and Analysis Plan for Site 7 Groundwater Sampling Report. As requested by the Navy, copies of this letter are being forwarded to Mr. Eric Helms at NWS Earle, Ms. Jessica Mollin at EPA Region 2, and Ms. Erica Bergman at NJDEP.

The Sampling and Analysis Plan for Site 7 Groundwater will be finalized and will incorporate, as appropriate, the responses outlined in the enclosed report. The final sampling plan will be distributed under separate cover. Sampling at Site 7 is scheduled for the week of July 6, 2009.

Thank you for the opportunity to submit this document. Should you have any questions or require additional copies please do not hesitate to contact me.

Sincerely,

Mary M. Mang
Project Manager

MMM/mp

Enclosure

c: Eric Helms (NWS Earle) (1 copy)
Jessica Mollin (EPA) (3 copies)
Erica Bergman (NJDEP) (3 copies)
Garth Glenn (Tetra Tech) (no enclosure)
John Trepanowski (Tetra Tech) (1 copy)
Glenn Wagner, (Tetra Tech) (1 copy)
Bonnie Capito (NAVFAC Lant) (no enclosure)
File

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Site 1-
DEP has no comments

Site 7-
SAP Worksheet 11 - Steps 2 and 5
I know this is just a sampling plan, but for the record, note, that if VOCs above GWQS are detected, the State will require additional vertical and horizontal delineation which will also include installation of a clean compliance well.

General comments-

1. Allowing for safety and access considerations, try and move proposed HP1 to the west to be more downgradient from MW-05 (~50-75 feet west).

The location of HP1 will be relocated to be downgradient of MW-05, to the extent that site access allows.

The location for HP2 looks generally ok, when in the field, be sure to locate HP2 as close to downgradient of MW-02 as possible.

The location of HP2 will be downgradient of MW-02, consistent with site accessibility.

2. Please field screen the soil boring (GP1) with an HNu or similar field screening instrument and bias depths of groundwater sampling (HP1 and HP2) to depths with any detected VOCs if applicable.

The Direct Push Technology (DPT) boring will be screened with a PID and groundwater samples will be collected at the depths corresponding to the highest PID readings.

3. Please report all analyzed VOCs and not just targeted VOCs.

The targeted VOCs are the full list of VOCs that will be analyzed and reported.

Sampling and Analysis Plan, Site 7 Groundwater
Naval Weapons Station Earle, New Jersey

Comments

1. SAP Worksheet #7 Personnel Responsibilities and Qualifications, page 19 of 69 – The responsibilities for Tim Johnston, Tetra Tech should not only include ensuring that the sampling and analysis meets Tetra Tech, Navy and NJDEP requirements but also EPA Region 2 requirements.

Reference to ensuring adherence to EPA Region 2 requirements has been added to the responsibilities of Mr. Tom Johnston in SAP Worksheet #7.

2. SAP Worksheet #11 Project Quality Objectives/Systematic Planning Statements, page 32 of 69 – It was stated in the second to the last paragraph on this page that a Tier II data validation will be performed. Please provide additional details of what a Tier II data validation would consist of.

The incorrect reference to the EPA Region 1 Tier II data validation protocol has been removed from Worksheets #11 and #36, and replaced with the EPA Region 2 SOP HW-24 Rev. 2, Validating Volatile Organic Compounds by SW-846 Method 8260B (October 2006), which will be followed for data validation.

3. SAP Worksheet #14 Summary of Project Tasks, Section 14.1.4 Hydropunch® Sampling, page 35 of 69 – It was stated that a peristaltic pump may be used to collect the sample from the submerged sample chamber. The use of a peristaltic pump for collecting VOC samples may introduce a negative bias due to potential volatilization resulting from the reduced pressure created. It would be preferable to have the sampling tool fill up with groundwater, then retrieve it to the surface and transfer the contents to the sampling containers.

The statement regarding the use of a peristaltic pump has been deleted. The groundwater sample will be collected directly from the HydroPunch® bailer.

4. SAP Worksheet #14 Summary of Project Tasks, Section 14.9 Data Review, page 40 of 69 – The referenced Region 2 data validation SOP is for inorganic analysis, the correct SOP is SOP HW-24 Validating Organic Compounds by SW-846 Method 8260B. This can be found at the following website : <http://www.epa.gov/region02/qa/documents.htm>.

The reference to the EPA Region 2 data validation procedure has been corrected.

5. Figure 10-3 Approximate Landfill Boundary, Site 7 – It would be helpful if the figure include the direction of the groundwater flow.

Figure 10-3 has been revised to include the direction of groundwater flow.