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LETTER AND COMMENTS FROM U S EPA REGION II REGARDING SITES 1 AND 11
OPERABLE UNIT 8 (OU8) NWS EARLE NJ
10/14/2003
U S EPA REGION II



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

OCT 17 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, 2nd column, 3rd paragraph, quantify the levels of 2,4-dinitrotoluene and RDX which were found.
3. Page 6, 1st column, 1st paragraph, explain what a confirmation study is.
4. Page 6, 2nd column, 1st paragraph. Further explain why soil wasn't sampled due to the close proximity of the water table.
5. Page 8, 1st column, 4th paragraph, EPA disagrees with the Navy's characterization that 5.6E-04 is at the upper end of the acceptable risk range. Its a 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, 2nd column, 1st 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, 1st column, last paragraph, Long-Term Monitoring. Add to the end of first sentence, "until groundwater reaches MCLs".
7. Page 11, 2nd column, 4th paragraph, last sentence, explain how metal contaminants decrease through precipitation.
8. Page 12, 1st column, 2nd paragraph. Institutional controls also need active monitoring and enforcement by the Navy. Provide a Land Use/Institutional Control plan.
9. Page 12, 1st column, 3rd 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.