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LETTER DESCRIBING OUTLINE OF STUDY PERFORMED BY U S NAVY EVALUATING
ENVIRONMENTAL IMPACT OF ALL OPERATIONS AND DISPOSAL PRACTICES DEALING
WITH HAZARDOUS WASTES NWS EARLE NJ

1/6/1989
NWS EARLE



DEPARTMENT OF THE NAVY

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NAVAL WEAPONS STATION EARLE
COLTS NECK, NEW JERSEY 07722-5000

IN REPLY REFER TO

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31 MAR 1989

Mr. John J. Trela, Director
Division of Hazardous Waste Management
New Jersey Department of Environmental Protection
401 East State Street
CN 028
Trenton, New Jersey 08625

Dear Sir:

At the Technical Review Committee Meeting of February 16, 1989, Mr. Frank Faranca of the Bureau of Case Management requested information on the study performed by the Navy in evaluating the environmental impact of all operations and disposal practices dealing with hazardous wastes. Described below is an outline of the development and implementation of the Navy program for the investigation of hazardous waste disposal practices at Naval activities.

The Comprehensive Environmental Responsibility, Cleanup and Liability Act (CERCLA) and Executive Order 12316 directed DOD activities to conduct studies of disposal practices at installations on Federal property. The Navy assigned the responsibility to conduct these studies to the Naval Energy and Environmental Support Activity (NEESA). NEESA developed the Naval Assessment and Control of Installation Pollutants (NACIP) program and under the program obtained the services of the environmental engineering firm of Fred C. Hart Associates, Inc. to conduct the Initial Assessment Study (IAS) at Naval Weapons Station Earle. The environmental engineering firm was under the direction and guidance of NEESA personnel. The team, consisting of nine environmental professionals, conducted the study at Naval Weapons Station Earle during July 1982. The study included record search of Navy and other government agencies for pertinent information, on-site investigations of all areas of the station, on-site investigation of all operations, review of prior environmental studies, confidential interviews with present long-term employees and former employees and aerial reconnaissance of the station. The team was given full access to all station activities and no pertinent operations or areas were excluded from investigation because of national security reasons. This exhaustive and thorough study identified 29 sites as having a potential for adverse impact on the environment. The Initial Assessment Study (IAS) was subsequently submitted to the United States Environmental Protection Agency and became the basis for an agreement between the Navy, the New Jersey Department of Environmental Protection (NJDEP) and the United States Environmental Protection Agency (USEPA) for further study. The agreement eliminated 18 sites from further study and the Navy began a detailed confirmation study at the remaining 11 sites. The Navy proceeded with the field investigation of the 11 sites until the USEPA and the NJDEP reopened the investigation of all twenty-nine (29) sites as a result of the more stringent requirements of the Superfund Amendments and Reauthorization Act of 1986 (SARA).



Naval Weapons Station Earle believes that the Initial Assessment Study (IAS) is complete and although we do not agree with some of the subsequent interpretation of the report by off site engineering firms hired by the USEPA, we see no need for a further study of this type. We plan to continue the site investigation of the 29 sites in cooperation with the NJDEP and the USEPA as agreed upon at the Technical Review Committee meetings so the Navy can proceed with its stated policy of the protection of the environment.

Sincerely,



E. P. NICHOLSON
Captain, U. S. Navy
Commanding Officer

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