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NWS EARLE
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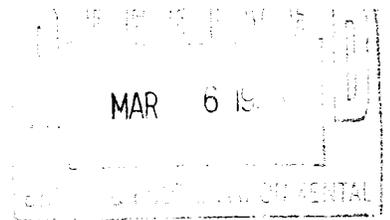
LETTER REQUESTING U S NAVY COMMENTS BE INCORPORATED INTO THE DRAFT
REMEDIAL INVESTIGATION REPORT NEW EARLE NJ
2/28/1996
NAVFAC NORTHERN

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DEPARTMENT OF THE NAVY

NORTHERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
10 INDUSTRIAL HIGHWAY
MAIL STOP, #82
LESTER, PA 19113-2090



5803-3.1-013

IN REPLY REFER TO

Code 1821/JK

FEB 28 1996.

Mr. Russell Turner, Project Manager
Brown & Root Environmental
993 Old Eagle School Road, Suite 415
Wayne, PA 19087-1710

Subj: DRAFT REMEDIAL INVESTIGATION REPORT - NWS EARLE

Dear Mr. Turner:

The subject draft report has been reviewed. Please incorporate the enclosed comments into the Draft Final R.I. Report. It is also understood that you will include the additional items (color maps, eco risk, December fieldwork) outlined in your letter of January 31 which accompanied the Draft Report.

Please call me if you have any questions regarding the comments. I will gladly discuss any new material or potential changes to confirm that all outstanding issues are resolved.

Sincerely,

A handwritten signature in cursive script, appearing to read "John P. Kolicius".

John P. Kolicius
Remedial Project Manager
By direction of the
Commanding Officer

Enclosure

NAVY COMMENTS ON DRAFT REMEDIAL INVESTIGATION REPORT
NAVAL WEAPONS STATION EARLE - JANUARY 1996

GENERAL COMMENTS

1. It is stated in several places in the report that the complete analytical data base is shown in Appendix A when in fact Appendix A contains only positive detects. The complete set of analytical data needs to be provided somewhere in the Appendix as non-detects in many cases are just as important as positive detects.
2. The site maps that are shown without sampling locations are of little additional value and should be deleted from the report.
3. Site boundaries should be clearly defined on the figures to the maximum extent possible based on available data. Wetlands classification abbreviations should be explained in the legend. The report should provide a complete classification key for NJ wetland classifications and National Wetland Classifications (if applicable).
4. A comparison of positive detects to state ARARs, NOAA screening values and federal MCLs with respect to the various media sampled needs to be shown for specific sampling points. This is necessary to determine hot spots and source areas. This comparison should be presented in each section.
5. The tables in the report need to be adequately sized so that they can be read. Landscape orientation should only be used when needed for several columns. The column widths and row heights should be sized for readability and optimum use of page space.
6. A section on surveying needs to be provided perhaps with a table of wells that shows identifications, previous elevations, new elevations, previous northing & easting, new northing and easting, well installation dates for both new & previous wells. An explanation is needed as to how and why elevations or locations as applicable were changed or adjusted. Footnotes could be used to supplement the table.
7. Miscellaneous parameter sample results are listed as provided in Appendix A but there is no discussion in the report as to why this information was collected, how it can be used and how these parameters are to be interpreted in a general or site specific sense. How is this information to be used for site and or risk characterization as well as influence on contaminant fate & transport? If a specific miscellaneous parameter was sampled at a site based on previous data, this should be explained.
8. The first three subsections of each site's Baseline Risk Assessment are redundant. The method is described in Section 2.4. The site specific sections should focus on the results.

Page 2-9 para 4, Remove all of it.

Page 2-9 para 5 Replace with "The sampling method utilized was successful in most cases of obtaining low turbidity samples. For some wells where turbidity was high a field decision was made to collect a separate filtered sample for comparison purposes."

Page 2-10 para 1 sentences 3,4,5,6 Replace existing sentences with, an in line flow cell used in conjunction with a mfr? Water quality analyzer was used to measure ph, conductivity, temperature, dissolved oxygen and salinity. Wells were purged until groundwater parameters stabilized. The low flow purge and sampling technique allowed for lower turbidity samples to be collected. Care was taken to ensure little or no draw down in water levels occurred throughout the purge and sample process.

Page 2-13 para 4, A total of ? Test pits were excavated at sites 3, 9 and 13. Two test pits at site 3 were excavated in an attempt to determine if a localized source of Target Compound List (TCL) semivolatile organic compound (SVOC) and volatile organic compound (VOC) contamination detected in monitoring well MW3-04 during the 1993 Roy F. Weston 1993 Remedial Investigation could be located. (Site 9 test pit discussion) 12 test pits were excavated at Site 13 to determine the extent and composition of fill material at the southern boundary of the site. A backhoe etc. Correct spelling of bucket. Would like test pit photos scanned & placed in appendix. Review of set of photos does not show a corresponding test pit identifier next to the pits. Do we know which test pits are which? Can photos be identified via field notes/photo log so they can be appropriately labeled?

Pages 2-22-2-23 What was disposition of contaminated soils & development water stored at site 16/F? Include disposal manifest in appendix.

Page 2-57 Section 2.4.3.2: Mention should be made about the current recreational adult scenario when discussing the choice of receptors. Hunting is permitted on the base, and this is a pathway. In fact, the activity has a great deal of participants engaging in the sport. The current industrial employee receptor provides a conservative estimate of potential risks from the sites, so risks should not be recalculated for a recreational adult. However, the text should reflect the consideration of this pathway and the rationale for not including it.

Page 3-14 Section 3.8: Knieskern's beaked-rush (Rhynchospora knieskernii) is the correct spelling and proper citation of this species. In addition, this species is **NOT A BIRD**. The species is a rare plant, more specifically a sedge. This plant is not federally endangered. It is listed as a state endangered species in NJ and a threatened species by the USFWS. Furthermore, in the same paragraph, the latin name for the swamp pink is correctly spelled and cited as follows: Helonias bullata.

Next paragraph--Mr. Ingrisano's name is spelled incorrectly in the source citation.

Page 4-13 Para 1 ...and care was taken to ensure little or no drawdown in water levels occurred throughout the purge and sample process. Recurring theme.

Page 4-14 Section 4.4.1 Para 1 What is meant by "combined outcrop area"? See surficial geology map. Recurring theme.

Page 4-13 Section 4.3.4 Eliminate slug test calculations. Give dates, wells, method, results. Refer to Appendix H for calculations or eliminate section completely as the same information with the exception of dates is repeated in section 4.4.2. Too much redundancy!

Page 4-17 Section 4.5.1 Confusing Eliminate sentence two. Reword background comparison. Background samples were not collected at Site 1. This is a recurring theme throughout the report.

Page 5-15 Section 5.5.2 What is significance of chloroform, 1,2,4 trichlorobenzene, 1,2 -dichlorobenzene, naphthalene, benzene & bis(2-ethylhexyl)phthalate found in groundwater samples. Are these or can these compounds be related to explosives or site history.

Page 5-15 Section 5.6.1 What is the significance of the bis(2-ethylhexyl)phthalate detected in surface soil samples. Is this compound used in the formulation of plastic explosives? Is it site related? What about fate & transport? Can it be related to level found in 02 GW 06? Lab/glove/plastic contaminant?

Page 6-1 Adjust location of drainage swale to the south (toward the wetlands area) and identify it properly in the legend. If the wetlands not picked up on the NJDEP wetland overlay note the field verification.

Page 6-3 Trash was encountered in both test pits at Site 3. Refer to test pit photos taken by Brown & Root or test pit log in Appendix E. Recommend scanned photo of test pits in Appendix E.

Page 6-4 Move turn-around area on drawing to the east so that the test pits equally intersect it at the end.

Page 6-6 Section 6.3.3 Which wells had dedicated pumps installed and which were sampled with a peristaltic pump. My recollection is that there was not enough water (head) available to expand the bladder in one or more of these wells. Was a bailer used for the VOC sampling and if so what wells? Be specific here as I know we had to do groundwater sampling differently due to inadequate water levels and poor recharge rates ie: water level dropped at low flow purge conditions. I believe on one or more wells we purged the well to dryness and returned the next day to sample.

Page 6-9 Section 6.3.3 The water level measurement range during the first round of measurements seems questionable 93.39 To 111.73. Perched water - tight formation? Survey problem?

Page 6-21 Section 6.6.4 How does the reduced level of arsenic found in the filtered sample for 03 GW 01 come into play or why were only cadmium and aluminum singled out as being higher than background levels? Section 6.7.5 identifies arsenic via ingestion of ground water as a major risk driver.

Page 7-1 Section 7.1: In the second paragraph, should state "from ...170 feet above MSL...to...150 feet [above] MSL". The word above needs to be inserted.

Page 7-3 Section 7.2 What were the previous concentrations of TCE & DCE found in monitoring wells MW4-05 & MW4-02, as these levels drove our Hydropunch effort for this RI? All that is stated is that TCE exceeded regulatory standards in MW04-05.

Page 7-4 Section 7.3.1 Be specific on Hydropunch locations. State which depths were obtained for each punch.

Page 7-5 Figure 7-2 DLG stream overlay not activated when map was printed. Streams/springs will show up and will intersect SW/Sed sampling locations.

Page 7-8 Section 7.3.3 Change first sentence to read: **B & R Environmental installed one additional permanent monitoring well (MW4-07) at the site in July 1995 to determine the validity of the 860 ppb detection of bis(2-ethylhexyl)phthalate as detected in 04 HP 05 and to provide an additional piezometer for ground water flow direction characterization.**

Page 7-12 Section 7.4.2 With the installation of MW4-07 the groundwater flow direction for this site appears to be radial with a east northeast component.

Page 7-26 Section 7.6.3 The statement in last paragraph "Since groundwater samples were collected using micropurge methods, filtering was not required." contradicts paragraph 3 regarding elevated turbidity in MW4-01, MW4-02, MW4-05. It was a field call not to filter. MW04-01 had a turbidity of 65 NTU, MW4-02 WAS 63 NTU, MW4-05 WAS 355 NTU.

Page 8-3 Section 8.3.1 Discuss the significance of ethylbenzene and xylene in HP 03.

Page 8-16 Section 8.6.4 Change last sentence to: Filtering of samples was not deemed necessary as relatively low turbidity readings were obtained.

Page 10-1 Section 10.1 Change last sentence to "**Small, marginal wetlands have formed in some areas on top of the landfill.**"

Section 10.1: The site description is incorrect. The site is vegetated with white pines (a non-native species) planted over the landfill rather than scrub pines. Why are the surrounding wetlands shown on the figures not included in the description? What is the value of the wetlands on top of the landfill? If they are small, marginal wetlands the report should state this.

Page 10-3 Section 10.3 Spelling - "suvey".

Page 10-6 Section 10.3.2 This surface soil sample was not collected in a wetland as per Abernathy's notes. Don't recommend you change sample designation # as it will impact analytical databases, but make this clear.

Page 13-1 Section 13.1 Incomplete description of site. No mention of the cedar stand, and insufficient description of the beaked-rush.

Page 13-3 Section 13.3.1 Ground water elevation range as indicated is just not possible at this site. Resurveyed wells should rectify.

Page 13-13 Section 13.6.4 Conclusion will change when groundwater contours are corrected.

Page 15-18 Section 15.5.2.1 How did the filtered samples compare to background samples or upgradient samples?

Page 15-42 Section 15.7.5 "ingestion of grounwater" spelling.

Page 18-1 Section 18.1 Description of this site is weak. No mention of locomotive engine cleaning vat in southwest corner of C-50 which drained to solvent leachfield.

Page 18-24 Was it not possible to measure groundwater elevation in existing MW-1. I believe I passed on survey data for TOC on this well. Was there a problem with elevation or do you need to be provided with this elevation?

29-1 Should be "Site Q" instead of "Site 2"

Chapter 30: The watershed samples collected will benefit the Navy in the event that we combine sites into operable units and try to assess the effects of sites in close proximity to one another on the environment or human health as a whole. However, it is not appropriate to perform a Baseline Risk Assessment on them as a whole. Unless we can accurately determine exposure to the receptors, the risk assessment is of no value. This is also true of the background samples. These samples should be utilized to provide an argument for elevated levels of constituents which are within background range of the area.