

**R sponse to EPA Comments, RI Work Plan  
NWS Earle, Colts Neck, New Jersey**

**EPA Comment Response**

**SITE 7**

**5.7.1**

Landfill boundaries are not well defined on the recent aerial photographs available at NWS Earle. Review of historical photographs available from other sources will be done as part of the RI preliminary activity. Monitor wells have been located along the perimeter of the known disturbed area.

As agreed at the TRC meeting on April 10 1990, the deep well has been deleted from the RI Work Plan (TRC meeting minutes, p. 7). Therefore at this time there will be no drilling to aquitard sediments.

**5.7.1.1/  
5.7.1.2**

The underground storage tank (UST) is suspected to have been used to store heating oil at a residence formerly at the site. A magnetometer survey will be performed to identify the location. The tank will subsequently be removed and confirmation sampling will follow.

**5.7.1.4**

See response to 5.7.1, para 2.

**5.7.1.6**

Revised sampling tables breakout analyses by media. Nitrite/Nitrate analysis will be done as part of the explosives compounds list.

**5.7.1.6**

A revised sample summary table was developed in response to this and other similar comments. the table was included in the April 10, 1990 distribution to the TRC.

**EPA Comment**

**Response**

SITE 10

5.8.1

See first part of response to comment 5.7.1.

5.8.1.2

Soil samples taken in boreholes will be used for lithologic descriptions only.

SITE 11

5.9.1

See response to comment 5.7.1.

5.9.1.2

Table of analysis (April 10) presents subsurface soil samples in discrete intervals as requested.

5.9.1.3

We suspect that well MW-11-1 is not a "background" well because it is too close to the source area. Based on the one round of water levels and sampling, MW-1 is probably upgradient and representative of background. Proposed monitor wells 11-5 and 11-4 on the revised figures (April 10, 1990) should address NJDEP concerns about well placement.

5.9.1.4

The revised sampling and analyses tables (April 10) clarify the recently revised sampling plan.

SITE 19

5.10.1

Swale is noted on revised Figure 5-18 (April 10). Field measured pH values are in the normal range for these waters (i.e. around 4.5). Results obtained in the laboratory should not be considered representative of actual field conditions.

5.10.1.2

Soil sampling intervals are shown in the sampling and analysis table submitted April 10.

**EPA Comment**

**Response**

5.10.1.3

Discharge pipe to swale is shown on revised Figure 5-18 (April 10).

5.10.1.4

See summary sampling and analysis table (April 10).

SITE 20

5.11.1

We feel that limited sampling is justified by the history of the site. The only issue at this site is piles of sand-blasting residue with possible a high metals content. The revised sampling scope (April 10, 1990) includes a characterization of the metals in the waste pile and soil sampling along the drainage way and the marshy area. The marshy area is extensive and does not appear to have an outlet. Groundwater sampling is not planned because of the generally low mobility of the metals. This was confirmed by the EPA Toxicity results.

SITE 22

5.12.1

The response to comments on Site 22 is similar to those on Site 20. The revised sampling scope includes characterization of waste material and drainage way sediments. No groundwater sampling is planned for the same reasons as those stated for Site 20.

SITE 26

5.13.1

The site map (Figure 5-11) was revised (April 10) to show drainage features and soil sampling has been added to the work scope. As with the other sites, the revised sampling scope includes a full analytical scan for all wells.

**EPA Comment**

**Response**

Other

Comment noted regarding references to regulatory limits in Tables 5-17, 5-21 and 5-28. These references were intended for discussion purposes only and have no direct bearing on the scope of the proposed sampling. They will be subsequently omitted in any revised documents.

A schedule of activities was prepared and distributed to the TRC. A new schedule accounting for the three sampling events is included with this submission. Since no Feasibility Study Work Plan has been prepared, we have not developed an FS schedule.