



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II

JACOB K. JAVITS FEDERAL BUILDING
NEW YORK, NEW YORK 10278

MAR 11 1991

Mr. Gerald F. Hoover
Project Engineer, Code 142
Environmental Restoration Branch
U.S. Navy, Northern Division
Naval Facilities Engineering Command
U.S. Naval Base, Bldg. 77 Low
Philadelphia, PA 19112-5094

Re: Naval Weapons Station (NWS) Earle

Dear Mr. Hoover:

The U.S. Environmental Protection Agency (EPA) has reviewed the Roy F. Weston, Inc. (Weston) response to EPA's comments submitted to the U.S. Navy (Navy) on December 13, 1989 on the Remedial Investigation/Feasibility Study (RI/FS) Workplan dated May 11, 1990 and additional responses magnafaxed to EPA on July 17, 1990, the Quality Assurance Project Plan (QAPjP) and the Health and Safety Plan (HSP) both dated June 1990. EPA magnafaxed additional comments on these Plans to Weston as follows: the RI/FS Workplan on December 13, 1990 (see Attachment I), the QAPjP on December 21, 1990 (see Attachments II & IV) and the HSP on January 3, 1991 (see Attachment III) in an effort for Weston to expedite finalizing the Plans. Some of these comments were originally submitted on December 13, 1989 and were never addressed in Weston's responses. Also, these comments were discussed at the TRC meetings and during the conference call held on July 25, 1990.

On January 18, 1991, Weston transmitted the Final RI/FS Workplan to EPA. I have not finished comparing it against the EPA comments magnafaxed to Weston on December 12, 1990. However, I have compared it against the RI/FS Workplan (dated October 1989) and noted that the Reference Section, Appendix A and Plate 1 have been omitted. These must be included as an addendum to the RI/FS Workplan. Also, under Section 4.1.2.4 Chloroform Toxicity (paragraph 2) "... at concentrations > 1,000 ppm" has been changed to "... at concentrations < 1,000 ppm", please clarify.

On February 4, 1991, Versar conducted an oversite inspection for the installation of well MW 3-5, which appears to be technically sound, however, the well was completed using a combination of the well installation specifications in the QAPjP (dated June 1990)

and the Final RI/FS Workplan (dated January 1991). The specifications in these documents should be identical, however, several inconsistencies between the two documents exist (e.g., the QAPjP states that a slot 10 well screen will be used, while the RI/FS Workplan indicates that a slot 20 well screen will be used. Also, both plans differ with regard to the type of sand pack to be used, length of screen, length of screen above the water table, amount of sand above the screen, thickness of the bentonite seal, and type of slurry mixture.)

EPA recommends that Weston submit one unified well construction specification for monitoring well installation in shallow unconsolidated material. They should also add a statement indicating that the amount of well construction material may vary according to site specific conditions.

At the TRC meeting held on February 13, 1991, Weston handed out an addendum to the QAPjP addressing EPA comments magnafaxed to Weston on December 21, 1990. However, most of EPA's comments were not addressed.

A conference call was held on February 14, 1991 to discuss the following issues relating to the QAPjP.

Blank water is to be used on-site for decontamination, field and trip blanks. Amelia Jackson requested that Weston submit analytical results of this water for all organics and inorganics of interest. On October 26, 1990, Weston submitted results only for the ASTM Type II Water. Gail DeRusso of Weston stated that the laboratory performs the required analysis on each lot of water sent into the field and they retain the results with the project files. She will send Ms. Jackson the analytical results at the start of the soil sampling and at the start of the groundwater sampling.

The Navy and Weston are still discussing with the New Jersey Department of Environmental Protection (DEP) to resolve the issue of the New Jersey Water Quality Standards being lower than the analytical method's detection limits for the groundwater samples. Ms. Jackson stated that Weston and the Navy will need to resolve this issue to avoid having their data rejected by the DEP in the future. They will let Ms. Jackson know what the final outcome is.

Regarding the data validation contractors - Heartland Environmental. This company has not yet assigned a validator to the NWS Earle project. When they do so, Ms. Jackson will review that individual's qualifications. The Navy is in the process of hiring someone to review the validated data, but has not yet done

so. Eileen Neilands will coordinate the validation effort but is not able to check the data for technical acceptance. Ms. Jackson stated that EPA is requesting to check the validated data as soon as it is available, early in the project. The Navy and Weston are amenable to this and will work out between themselves, whether the original or a copy of the validated data package will be provided to EPA.

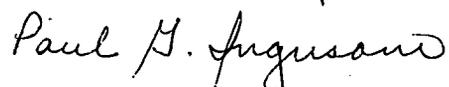
After the conference call, you and I agreed that all of EPA's comments on the RI/FS Workplan, QAPjP and HSP would be addressed and would be added as an addendum to the Plans.

On March 1, 1991, Amelia Jackson attended the soil and sediment sampling at Site 19. She observed that the volatile organic samples were not collected in 40 ml glass vials with septum seals. Weston had to borrow these bottles from Versar. This was discussed during the conference call held on July 25, 1990 and Attachment II, Item 22b magnafaxed to Weston on December 21, 1990. Also, Weston was using deionized water instead of HPLC water in the last step of the decontamination procedure. Weston agreed to use the HPLC water in the future. This was discussed during the February 14, 1991 conference call.

As you and I discussed on March 4, 1991, any volatile organic samples collected on February 27-28, 1991, not using the 40 ml glass vials will have to be resampled.

If you have any questions concerning this matter, please contact me at (212) 264-6690.

Sincerely yours,



Paul G. Ingrisano
Project Manager
Federal Facilities Section

Enclosures

cc: Captain W. M. Migrala, Jr., NWS Earle, w/encl.
J. Freudenberg, NJDEP, w/encl.
R. Johnson, Weston, w/encl.
D. Weeks, Versar, w/encl.