



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II

JACOB K. JAVITS FEDERAL BUILDING

NEW YORK, NEW YORK 10278

JAN 24 1992

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. 77Low  
Philadelphia, PA 19112-5094

Re: Naval Weapons Station (NWS) Earle

Dear Mr. Hoover:

The U.S. Environmental Protection Agency (EPA) has reviewed the Site Inspection (SI) Workplan dated September 1991. Most of the comments in EPA's August 12, 1991 letter have been addressed, however, a few remain and must be included in the Final SI Workplan. General comments are included in Attachment 1, while specific comments are included in Attachment 2.

If you have any questions concerning this matter, please contact me at 212-264-6609.

Sincerely yours,

A handwritten signature in cursive script that reads "Paul G. Ingrisano".

Paul G. Ingrisano  
Project Manager  
Federal Facilities Section

Enclosures

cc: CPT W. M. Migrala, Jr., NWS Earle  
CDR J. P. Dell, NWS Earle  
J. Freudenberg, DEPE  
R. Meier, Versar

## ATTACHMENT 1

General Comments on the Final SI Workplan as compared to EPA's August 12, 1991 letter, are as follows:

4. The Final SI Workplan should include individual site maps that clearly delineate the site locations and site boundaries (e.g., Figures 5-5, 5-7, 5-12 and 5-13).
6. The Final SI Workplan should state where the slug tests are to be performed (i.e., which sites and wells). The June 20, 1991 response letter from the U.S. Navy stated, "Slug tests will be performed on several groundwater monitoring wells consistent with the RI/FS Workplan. This will be included in the revised SI Workplan", however, slug tests were not mentioned in the revised SI Workplan.
10. The recommendations for Sampling and Biological Assessment by the National Oceanic and Atmospheric Administration will be addressed under a separate letter.
12. EPA's comments on the Navy's responses (June 20, 1991) with respect to the Quality Assurance Project Plan (QAPjP).
  - a. The QAPjP from the RI will also be used here, with an addendum prepared with modifications for these sites.
  - b. The analytical methods to be employed for this SI should be included in the addendum to the QAPjP to be prepared.
  - c. Sample analysis for volatile organics are recommended if specific petroleum hydrocarbon compounds are desired at those sites where total petroleum hydrocarbon (TPHC) is of interest. The volatile organic analysis would yield information regarding the presence of benzene, toluene, xylene, and ethylbenzene, in addition to the other TCL volatile compounds.

The following comments are based on the review of the SI Workplan dated September 1991.

The tables and the text should be consistent, full TCL organics versus TCL organics. This consistency should be applied to the other parameters as well. The tables should be listed vertically instead of horizontally, for easy reference. Also, the words soil and sediment should be clarified in the text.

### § 1.3 Objectives of the Current SI effort

Sites 14, 28 and 29 should not be excluded from the SI program until it can be proven that these sites have been adequately remediated. Either supply sampling results from the past, or sampling must be done as outlined in Attachment 2.

Delete this sentence, "Although no formal SI activities are required at any of these sites, the Agencies have requested that they be addressed in the SI work plan and report".

#### § 2.1.2.2 Station Water Supply

The inactive supply wells were listed as being active in the Draft SI Workplan. When did the wells become inactive and why? Have these supply wells been determined to be contaminated?

#### Figure 2-3

Sites 1 & 13 are missing.

#### Figure 5-1 SI Activity Matrix

The Activity Matrix should be updated to reflect the changes which are to be made as a result of this letter.

#### 5.4 Site 6

##### Boring Log Review

Provide a copy of these boring logs to EPA.

## ATTACHMENT 2

### 2. §5.4 - Site 6

- d. Head space analysis should be used as a guide to where to take the samples and at what depth within the landfill. Two soil samples should be taken, one within the landfill and the other beneath the landfill, for full TCL and TAL analysis.
- g. Air monitoring (using HNu and Explosimeter) should be completed in and around the recreation building in order to identify any potential risk from VOC's and other combustible gases, to people using this area.
- i. The construction drawings are under review and will be addressed under a separate letter.

### 3. §5.5 - Site 17

Four soil borings should be taken along the long axis of the fill area as shown on Figure 5-3. Two soil samples should be taken, one within the landfill and the other beneath the landfill, for TAL inorganics. This sampling and analysis, will give a better understanding of what the fill material is composed of and what may have leached from the landfill into the groundwater.

### 7. §5.9 - Site 13

- a. Samples should also be obtained for full TAL metals analysis.

### 8. §5.10 - Site 14

- a. A visual inspection of this site is recommended, as well as documentation of the history of the warehouse activity. Samples should be taken for what was stored in the warehouse, as well as for mercury (wipe samples).

### 9. §5.11 - Site 15

- b. Subsurface soil samples should be taken and analyzed for semivolatiles. Based on the results of the soil samples, monitoring wells may be required to be installed during the RI phase.
- c. Soil samples should be taken above the soil/ground water interface.

10. §5.12 - Site 16

- c. Soil vapor screening should be conducted to select soils for analysis. Samples should be taken for semivolatiles and TPHC.

14. §5.16 - Site 27

- b. Five surface samples and five subsurface samples should be taken for full TCL and TAL analysis, in place of what was proposed in the SI Workplan.
- c. Based on the results of the soil samples, monitoring wells may be required to be installed during the RI phase.

16. §5.18 - Site 29

Samples should be taken around the perimeter of the area that was remediated. Four on the sides and one in the center of the excavation, which should be analyzed for PCB's and TPHC.

17. Site GG

This has been referred to the NJDEPE and is still under review. It will be addressed under a separate letter.