



DEPARTMENT OF THE NAVY

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

N60478.AR.000316  
NWS EARLE  
5090.3a

IN REPLY REFER TO

Code 1821/JK

MAR 17 1995

Mr. Jeffrey Gratz, Project Manager  
U.S. Environmental Protection Agency  
18th Floor, East  
290 Broadway  
New York, New York 10007-1866

Subj: EPA COMMENTS ON THE NAVY'S DRAFT REMEDIAL INVESTIGATION  
WORKPLAN FOR NAVAL WEAPONS STATION EARLE, COLTS NECK, NJ

Dear Jeff:

As discussed during our meeting of 16 March 1995, responses to your letter of 3 March 1995 are enclosed. By copy of this letter, our contractor is directed to incorporate these changes into a draft final workplan.

Your input into the resolution of several issues was appreciated. The Navy will make every effort to finalize and implement this workplan as expeditiously as possible. If any other issues come up, please call me at (610) 595-0567 Ext. 157.

Sincerely,

JOHN P. KOLICIUS  
Remedial Project Manager  
By direction of the  
Commanding Officer

Copy to:  
Mr. Don Blackert, HNUS  
(w/copy of EPA ltr. of 3/3/95 and enclosure)

Responses to EPA Comments on draft Remedial Investigation  
Workplan for Naval Weapons Station Earle (February 1995)

GENERAL COMMENTS

1. Watershed sampling will be included at the sampling locations proposed at our 3/16 meeting.
2. The need for an updated well survey will be addressed in the work plan.
3. The scope of work for the field work includes integration of all existing maps into an integrated active system. A statement to this effect will be added to the workplan.
4. We agree with your recommendation. Hydropunch samples will not be tested for metals.

PAGE-SPECIFIC COMMENTS

- 2-6 a. The text will be corrected on pages 2-6 & E-28 - E-29.
- b. We agree that use of acetone rinse is inappropriate based on previous concerns. The workplan will be changed to reflect use of a methanol/hexane rinse sequence.

**Waste Handling:** We appreciate this comment. We will investigate appropriate guidance.

2-7 The text will be clarified to state the synoptic nature of the water level measurements.

3-1 The requested statements will be added to the text and the reference to compositing in SOP GH-1.3 will be crossed out.

3-2 a. The Site 1 analytical program will be included.

b. All tables will be checked and discrepancies corrected.

3-17 a. We will instruct the contractor to make the changes indicated in the Navy's 5/3 letter.

b. Cr<sup>+6</sup> will be added.

3-22 The requested statements will be added.

3-23 **Bullet #3:** Sampling device will be noted. NOTE: Navy has decided to install dedicated sampling pumps at all wells.

**Para. after bullets:** These specific parameters will be added to the text.

**Section 3.2.4:** The proposed type(s) of equipment will be defined. A brass Kemmerer device will not be used and this will be noted.

3-30 a. Text will be changed where appropriate.

b. Text will be changed.

**Table 3-1 will be modified where necessary.**

3-31 a. Text will be changed as requested on p. 3-31 and wherever necessary to read "demonstrated analyte-free water".

b. The contractor will be asked to determine which scenario will occur and to modify the text accordingly.

4-1 Change will be made.

4-2 Correction will be made.

4-4 a. The figures referred to unvalidated values reported in the draft interim SI. The validated results were much lower. A statement will be added to the text which indicates some question regarding these parameters due to uncertain data.

b. The figures referred were unvalidated values reported in the draft interim SI. The validated results were much lower. A statement will be added to the text which indicates some question regarding these parameters due to uncertain data.

4-5 a. Analytes will be added.

b. Depths will be changed as requested.

c. Borings will be added and deleted as requested.

d. Borings will be added and deleted as requested.

e. Two more hydropunch borings will be added as requested.

5-2 a. Year will be added for each well.

b. All points and legend will be verified.

5-3 a. Sampling strategy will be changed as noted.

b. Data for this area is collected regularly as a condition of the RCRA Subpart X permit. A statement will be added to the text indicating this data will be evaluated in the RI report.

6-2 Surface soils at point WET 3A-1 will be sampled.

6-3 a. VOCs/SVOCs will be sampled if appropriate (based on a sustained high reading on the PID/FID).

b. Well 03-04 will be checked. Low flow techniques may help the viability of this well.

c. Soil gas survey will be conducted first as requested.

d. Drum has been removed. Text will be deleted.

7-2 WET 4B-5 will be sampled (Surface water/sediment if flow is found, surface soils otherwise). A newly discovered spring near MW04-05 will also be sampled.

7-5 A multi-depth hydropunch will be added as proposed. If no contamination is found at depth, the 2 deep wells will be eliminated.

8-1 HNu reading for TP5-1 can be noted. "Saturated" on TP5-2 referred to water.

8-5 a. Additional hydropunch samples will be added near well MW05-06.

b. Noted parameters will be specified.

9-3 Samples were subsurface. Table will be corrected.

9-10 No active seeps have been found in this area. The entire site is bounded by wetlands. Surface water and sediment will be sampled in the vicinity of points WET 6A2 and WET 6A5 if suitable locations can be identified.

10-2 WET 7B-2 will be sampled (surface soils).

15-2 Well locations will be adjusted as requested.

15-8 **Para. 2:** Access to this area could be difficult. An additional well will be placed as near as possible to this location with access from the adjacent jeep trail.

**Para. 3:** Surface water pathways are not well-defined in this area. Previous soil borings in this area were 1-3 feet in depth. Two surface water and sediment samples will be added if ponded water is observed.

17-7 Additional surface water/sediment sample will be added.

18-5 Text will be changed.

19-9 Table will be amended.

**General Comment:** As discussed on 3/16, the possibility of natural stabilization with wetlands grasses will be further investigated by the Navy.

20-5 a. One location near 022 will be added. An additional downstream sample is proposed in our watershed plan.

b. A sample at 2-3 feet will be added.

c. Chromium valences will be determined.

d. Although your proposed location may not actually be in an assumed flow direction, the well will be moved to this area since a removal action could impact our originally proposed point.

21-1 Removal is complete. Text will be amended.

23-3 This refers to unvalidated values reported in the draft interim SI. The validated results were much lower. A statement will be added to the text which indicates some question regarding these parameters due to uncertain data.

**General:** Localized flow near the northwest corner of the building is toward the standing water. The general surface water flow is as shown.

24-1 Text will be amended.

24-6 Nitrate will be added.

25-3 a. The soil gas grid will be expanded as requested.

b. The text will be modified to state 2 additional wells may be added based upon the the results of the soil gas survey.

c. Two soil borings will be added in the area of the most significant soil gas readings.

d. Two borings will be added with samples at two depths.

**Background** Second paragraph on 30-1 states this intent.