



State of New Jersey
Department of Environmental Protection and Energy
Division of Responsible Party Site Remediation

CN 028
Trenton, NJ 08625-0028
Tel. # 609-633-7141

Scott A. Weiner
Commissioner

Karl J. Delaney
Director

Rec'd
30 AUG 1993

Department of the Navy
Northern Division
Richard Frattarelli
East Pennsylvania Area
Naval Air Development Center
Warminster, PA 18974

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

AUG 24 1993

Re: Naval Air Warfare Center, Trenton, UST# 0060482
TMS# C93-0868, Case# 93-03-08-1205
Tank #1

Dear Mr. Frattarelli:

On March 3, 1993, the New Jersey Department of Environmental Protection and Energy (Department) received notification of a discharge of hazardous substances from the above referenced facility which is regulated under the Underground Storage of Hazardous Substance Act (N.J.S.A. 58:10A-21 et seq). The Department received a remedial investigation report from GSC Corp. dated June 15, 1993, indicating that the following actions were taken in compliance with our requirements.

One 500 gallon #2 heating oil UST was removed from the above referenced facility. contaminated soils were encountered, as well as a sheen on the groundwater surface, and the Hotline was called. Contaminated soils were removed, and post excavation samples were collected. There were no contaminants found in the soils that exceeded the Departments cleanup goals for soils.

I. Deficiencies/Requirements

Based upon a review of the remedial investigation completed to date, the following deficiencies shall be addressed as required below.

A. Remedial Investigation

1. Groundwater

Since a sheen was noted on the water surface in the excavation, groundwater sampling is necessary. One monitoring well shall be installed in the former excavation. If it is not possible to install the well in the former excavation, then the well may be place in the assumed downgradient direction within 10 feet of the excavation. The well shall be sampled for VO+10 using EPA method 624, and B/N+15 using EPA method

625. Please refer to the Technical Rules for Site Remediation, N.J.A.C., 7:26E for further guidance in conducting a groundwater investigation.

B. Quality Assurance

1. All data submitted shall conform to the "Reduced Laboratory Deliverables Format" consistent with the guidance contained in the rule "Technical Requirements for Site Remediation", N.J.A.C. 7:26E (use the attached quality assurance checklists).

C. General

1. Notify the assigned case manager at least 14 calendar days prior to implementation of all field activities.

2. After remediation of the soil and ground water has been completed the responsible party is requested to submit the total capital costs involved in performing and confirming a cleanup as well as the costs associated with the proper disposal of all wastes generated during the cleanup. Costs to be reported include monitoring systems, equipment and mobilization costs; operational and maintenance costs, including all labor, utilities and repairs; consulting and labor costs, and sample costs; all disposal costs, including transport, waste transfer and facility tipping fees as well as regulatory review fees.

II. Reporting Requirements

A written report (RI Addendum Report) shall be submitted to this Bureau at the above address, within 90 days of receipt of this letter, specifying all activities conducted in compliance with the requirements listed in this letter. To facilitate processing, please reference the Case number and UST number in the report. In addition, if soil or ground water contamination is present, a Remedial Action Workplan shall be submitted with RI Addendum Report. If no further remediation is required for the site, a proposal for no further action shall be submitted.

III. Certification

It is important to note that effective April 25, 1992, all persons performing tank services must be certified per N.J.S.A. 58:10A-24.1-8. All work related to any tank service shall now be conducted by, or under the immediate on site supervision of an individual certified in the activity being conducted. All documents (permit applications, reports, proposals) submitted to the Department shall be prepared and signed by a certified individual.

IV. Technical Requirements

The "Technical Requirements for Site Remediation" rules (N.J.A.C. 7:26E) appeared in the June 7, 1993 New Jersey Register and became effective on July 1, 1993. These rules contain the minimum technical requirements concerning the environmental investigation and remediation at contaminated sites or sites at which contamination is suspected. These rules are being used as the Department's primary technical document, replacing the Division of Responsible Party Site Remediation's Remedial Investigation Guide, the ECRA Cleanup Plan Guide, the Bureau of Underground Storage Tanks' (BUST) Scope of Work document (and appendices) and the BUST Technical Guidance Document. A copy of these rules can be obtained from your local library or through the Office of Administrative Law Publications at (609) 588-6606.

It should be noted that technical requirements are included in subchapters 7, 8 and 9

of the regulations implementing the Underground Storage of Hazardous Substances Act (N.J.A.C. 7:14B-1-13 and 15). The responsible person(s) that are conducting an environmental investigation/remediation should be following the "Technical Requirements for Site Remediation" to accomplish the investigation. This will allow for consistent evaluation of any discharges and potential impacts.

V. Cleanup Criteria

The Department's most recent general guidance on contaminant cleanup criteria can be found in the April, 1993 edition of the "Site Remediation Newsletter". It must be remembered, however, that the actual cleanup goal at a particular site is determined by the Department on a case-by-case basis and may be different than that in the above referenced newsletter. This variation may be due to many factors, including, site specific human health and environmental exposure pathways, the presence of site contaminants not addressed in the newsletter, and site specific physical characteristics. In case specific situations, when the cleanup criteria is modified from one previously established for that specific site, the Department will make every effort to expeditiously notify the responsible party. Please consult the Case Manager listed below to discuss any modifications which may impact upon your remedial actions.

If the person conducting a cleanup does not wish to remediate a contaminated site consistent with the newsletter, they shall submit a proposal to their Case Manager listed below that details the site specific circumstances and technical rationale for cleanup goals on a case-by-case basis.

Please note that the Ground Water Quality Standards (N.J.A.C. 7:9- 6) have been adopted and appeared in the February 1, 1993 New Jersey Register. This rule adoption may impact upon the requirements for ground water remediation and soil cleanup (i.e. where the soil may contribute contaminants to the ground water above the applicable standards) for a particular site and should be referenced and discussed with the Case Manager listed below.

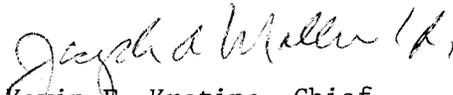
VI. Compliance

As per N.J.A.C. 7:14B-12.1, the owner and operator of regulated underground storage tanks are joint and severally liable for compliance with these regulations.

Failure to comply with the requirements in this letter may result in the assessment of penalties as provided for by law. Pursuant to the Underground Storage of Hazardous Substances Act, N.J.S.A. 58:10A-21 et seq, violators are liable for penalties of up to \$50,000 per day for each day of continuing violation.

If you have any questions, please contact Timothy Nuss, of the Bureau of Underground Storage Tanks, Tank Management Section, Phase I at (609) 984-3156.

Sincerely,



Kevin F. Kratina, Chief
Bureau of Underground Storage Tanks

ISEE: TEN

c: Mercer County Health Dept.
Timothy Nuss, Bureau of Underground Storage Tanks