



DEPARTMENT OF THE NAVY

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

IN REPLY REFER TO

5090  
SER:1128/ejb

JAN 28 1997

Ms. Donna Gaffigan  
New Jersey Department of Environmental Protection  
Division of Responsible Party Site Remediation  
401 E. State Street  
CN 028  
Trenton, NJ 08625-0028

Subj: NAWC TRENTON SUBMITTAL OF FINAL REMEDIAL INVESTIGATION REPORT

The Navy is submitting a Final Remedial Investigation Report, the draft version of which has been available since 1994. We are distributing this document as Final to make it publicly accessible. We wish to move forward with investigations and acknowledge some of the inadequacies of the report. Much of the delay and complications arise from the requirement that the contract with IT be terminated in 1994. We appreciate the patience and guidance of the regulatory community while attempting to respond to your comments.

HISTORY OF CORRESPONDENCE

July 1994	IT Corporation on behalf of the Navy submits a Final Draft Remedial Investigation Report to NJDEP and EPA for review
Sept 21 1994	Navy received EPA Comments attachment (1)
Nov 2, 1994	Navy received NJDEP Comments attached (2)
Nov 1994	Contract with IT Corp canceled
	Navy received one copy of Final RI Report dated Nov 1994
Feb 3, 1995	Navy responds to comments by letter to EPA and NJDEP attachment (3)
Jan 23, 1996	NJDEP letter cites comments not adequately resolved attachment (4)
March 5, 1996	Navy summarizes regulator comments and the Navy responses attachment (5)
Nov 1996	Navy distributes copies of November 1994 RI Report that has had minor text changes made by the Navy.

SIGNIFICANT CHANGES SINCE 1994

The Navy has constructed and interim action ground water pump and treat plant that operated briefly in 1995 and has operated almost continuously since February 1996. EA Corporation has been under contract to provide ground water monitoring and assessment regarding the treatment plant operation since January of 1995. The

ENCL (1)

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US Geological Survey under a Memorandum of Understanding has been providing technical expertise in support of the Navy's efforts to delineate and remediate the TCE problem at the site. Currently, EA is installing thirteen additional monitoring wells to delineate the Site 1, 4 and 8 TCE plume. It is anticipated that additional wells will be installed to delineate and characterize the Site 3 plume also. It is anticipated that these field efforts will satisfy any comments regarding plume delineation at Sites 1, 3, 4, 5 and 8.

NAES Lakehurst on behalf of NAWC Trenton performed additional sampling to characterize certain areas such as Site 9 and the Jet Fuel Tank Farm. They also participated in a time critical removal action to excavate and dispose of the sludges buried at Site 3. A decision document recommending No Further Action for Soils is being finalized. The February 1995 response to comment letter cited Navy plans to submit a document establishing background concentrations of inorganics in soil at NAWC. The No further action document, along with guidance from NJDEP has made the submission of the background soils document unnecessary.

The Navy has completed inspection and repair of two outfalls of the storm sewer system. Work on the other storm sewer outfalls is in progress. These projects are intended to stop the inflow of contaminated ground water to the storm sewer system.

The Navy also recognizes the NJDEP concerns regarding the adequacy of the Gold Run ecological evaluation (Chapter 19). Any future work regarding Gold Run and the ecological evaluation will be revisited when funded in 1997, but are not expected to delay any decision regarding ground water remediation or base reuse.

#### EPA COMMENTS RESOLVED

Given the ongoing ground water investigation and the work that has been completed in the last two years the Navy considers the following comments resolved.

#### EPA General Comments 1-6,8-10

The NJDEP pointed out that revised text for comment/response 7 describing the barometric well (chapter 8) had an incorrect reference to the bedrock joint system. This error has been removed from the report. The USGS Site I Hydro-geologic Findings Report can be considered the most up to date and complete description of the geology.

#### EPA COMMENTS NOT RESOLVED

EPA Comment 7 addresses concerns of how the barometric well impacts ground water. The Navy, EPA and NJDEP disagree over the method of determining what ground water impacts may be due to the barometric well and associated piping. However, the field work this summer will attempt to determine if there is a correlation between

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barometric well pumping and ground water fluctuations ( EA FFS Workplan page 4-10). Additionally, the barometric well integrity is being retained as an Area of Concern that must be addressed at closure.

#### NJDEP COMMENTS RESOLVED

General comments 1-12 have been resolved with the following text added for clarification. Comments 4, 5 and 6 involve the submission of text regarding aquifer test calculations. The NJDEP has not yet reviewed the text, however the Navy believes it will be adequate. General comment 12 related to deed restrictions being necessary because non-residential soil criteria are being used as cleanup levels. The Navy agrees to the restriction, however the transfer of the property has not taken place so the deed restriction is not yet in place.

Specific comments 1-8b and 9b-15 have been resolved.

Ecological Comments 1a, 2c, 3-8, 10, 12a and 13 have been resolved with the following additional information. Comment 1c regarded TCE being detected in background bedrock well 18 BR. The well has been resampled twice, with TCE being not detected in the latest round. The Navy feels the TCE detected in 1993 was due to poor pump decontamination. The data will be submitted under separate cover. Comment 7c regarded text comparisons of VOA levels to site background. The Navy agrees the VOA background level of zero, however certain text references remain in the document. Comment 13 involved the NJDEP requesting a summary of the interim action and the storm sewer work. The Navy submitted an action memorandum and intends to provide an update when the plant upgrade is complete. The Navy also provided the Halliburton NUS Storm Sewer Evaluation Report in February 1996 which covered Outfalls 1 and 2. Any future information from Outfalls 3 and 4 will also be shared with NJDEP. Ecological Comment 13 involves text the NJDEP has not yet reviewed. The Navy believes the new text will be adequate.

#### NJDEP COMMENTS NOT RESOLVED

Specific comment 9a regarded the barometric well integrity, which will be determined at closure as described above with EPA comment 7.

Ecological Comments 1 b, 2a, 2b, 9, 11, 1 2b all regard the adequacy of the Gold Run investigation, which will be revisited in 1997

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In summary, the Navy is submitting the final Remedial Investigation Report and proceeding with ongoing and future investigations to adequately address unresolved issues. If you have any questions, please call me at (610) 595-0567 x175.

Sincerely,



EDWARD J BOYLE  
Remedial Project Manager  
by direction of the  
Commanding officer

Encl: (1) NAWC Trenton Remedial Investigation Report

Attachment: (1) Navy received EPA Comments attachment  
(2) Navy received NJDEP Comments  
(3) Navy responds to comments by letter to EPA and NJDEP  
(4) NJDEP letter cites comments not adequately resolved  
(5) Navy summarizes regulator comments and the Navy responses

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copy: Ken Smith, BEC NAWC Trenton  
Donna L. Gaffigan, NJDEP  
Bill Lawler, USEPA  
Pierre J. Lacombe USGS