



State of New Jersey

Christine Todd Whitman
Governor

Department of Environmental Protection

Robert C. Shinn, Jr.
Commissioner

Debra L Felton
Northern Division
10 Industrial Highway
Mail Stop #82
Lester, PA 19113-2090

OCT 20 1998

Re: Work Plan for Underground Storage Tank Removal and Abandonment In-Place
Revision 2

Dear Ms. Felton:

I wish to welcome you to the Naval Air Warfare Center, Aircraft Division, Trenton Base Cleanup Team. I look forward to working with you, the new BRAC Environmental Coordinator (BEC), as we move towards cleanup of this base. From this point forward, I will address all correspondence to your attention.

The New Jersey Department of Environmental Protection (NJDEP) is in receipt of Revision 2 of the Work Plan for Underground Storage Tank Removal and Abandonment In-Place dated October 9, 1998. Upon review NJDEP has the following comments:

1. General Comments

Previous versions of the Work Plan discussed the following underground storage tanks (USTs) and oil-water separator (OWS), collectively "the USTs":

Description	Capacity (gallon)	Location
Solvent Tank	1000	Outside Bldg 21
Oil Storage Tank	550	Outside Bldg 41
Oil Storage Tank	550	Outside Bldg 21
Oil-Water Separator	2000	Outside Bldg 21
Oil Storage Tank	550	Outside Bldg 40
Waste Oil Storage	550	Inside Header Pit
Glycol Storage	1000	Outside Bldg 40

This Work Plan (and its predecessors) is currently the only written documentation of the remediation of these seven USTs, but it is rather sketchy and brief. Therefore, the final UST remedial action report must provide a more detailed account of the discovery (i.e. through review of site drawings, observation of a fill

pipe, etc.), the previous field activities and the removal/abandonment each of the seven USTs. As stated in the Work Plan, but reiterated here, the remedial action report must meet the requirements of N.J.A.C. 7:26E-6.6, including appropriate scaled figures.

2. Section 1 – Mobilization, Site Preparation and Previous Activities, pg. 2

The end of the third paragraph states that soil was removed from the OWS and the cover was replaced. Since no other information is provided, NJDEP is interpreting this as meaning that the Navy considers the OWS closure to be complete. Be advised that the OWS meets the definition of an UST, therefore, the Navy must propose an appropriate closure for the OWS in accordance with the NJ Technical Requirements for Site Remediation (Tech Regs), N.J.A.C. 7:26-E.

3. Section 2.2 – Excavation of UST #1, pg. 3

The second paragraph states that any tie-down slabs will be left in place. This is acceptable provided that a) the slab does not interfere with any soil sampling locations (i.e. soil samples would still be required in the appropriate location despite the presence of the slab) and b) the existence of the slab is documented in the remedial action report.

4. Section 3 – Tank Abandonment in Place, pp. 3-4

a. It is stated that a signed, sealed certification by a licensed NJ professional engineer will be provided stating why *removal* of the 550 gallon waste oil UST is not feasible. The certification must be forwarded to my attention as soon as possible before excavation can begin.

b. The last sentence states that soil samples will be collected from *around* the abandoned UST. Be advised that the Tech Regs require that the soil samples be collected *through* the bottom of the abandoned UST, N.J.A.C. 7:26E-6.3(b)6ii(3), unless a licensed NJ engineer certifies that *sampling* is not feasible pursuant to N.J.A.C. 7:26E-6.3(b)6iii. This discrepancy must be resolved.

5. Section 4.2 – Post-Excavation Sampling - Tank Abandonment in Place, pp. 5-6

The section discusses the sampling frequency and sampling analyses for the OWS, yet Section 3 only discusses the abandonment of the 550-gallon waste oil UST. This discrepancy shall be resolved.

6. Section 4.3 – Post-Excavation Sampling – Quality Control Requirements, pg. 6

It is stated that reduced deliverable packages will be provided by the laboratory. Be advised that the data shall be submitted as a hard copy and an electronic deliverable in accordance with 7:26E-3.13(c). The specific instructions for

submitting electronic data can be found on the Site Remediation Program's Home Page at www.state.nj.us/dep/srp, under "Regulations and Guidance."

7. Section 5 – Overburden, Backfill Material and Drum Sampling, pg. 6

- a. This section identifies the analyses that will be performed on the stockpiled soil. It should also reference the criteria to which the data will be compared.

- b. To reiterate one of NJDEP's previous comments, the analyses required for disposal of the drummed tank residual liquids and tank cleaning rinsates may differ from those listed in the Work Plan (i.e. TCLP analytes rather than TCL analytes). Please check with the disposal facility for the appropriate requirements before collecting and analyzing samples.

Because of the nature of these comments, NJDEP requires that a final revised Work Plan be submitted.

If you have any questions regarding this letter, please do not hesitate to contact me at (609) 633-1494.

Sincerely,



Donna L. Gaffigan, Case Manager
Bureau of Federal Case Management

cc: Edward J Boyle, North Div