



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

DEC 03 1998

Re: Naval Air Warfare Center, Aircraft Division, Trenton
Summary Report for May 1998 Quarterly Ground Water Sampling Event

Dear Ms. Felton:

The New Jersey Department of Environmental Protection (NJDEP) is in receipt of the Summary Report for May 1998 Quarterly Ground Water Sampling Event dated July 30, 1998 prepared by EA Engineering, Science and Technology for the Navy. This represents the first quarterly sampling event in accordance with the First-Year Monitoring Plan (February 13, 1998). Upon review of the quarterly report NJDEP has a few comments which have been enclosed for your convenience.

Be advised that pursuant to the New Jersey Technical Requirements for Site Remediation, specifically N.J.A.C. 7:26E-3.13(c)3V, all data generated in the future must be presented both as a hard copy and as an electronic deliverable. 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."

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

Sincerely,

A handwritten signature in cursive script that reads "Donna L. Gaffigan".

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

Enclosure

c: William Hanrahan, BGWPA
William Lawler, USEPA
Jeffrey Dale, NorthDiv

Summary Report
for May 1998 Quarterly Ground Water Sampling Event
July 30, 1998

1. Cover Letter from EA to Northern Division

a. In the first paragraph on page 1, EA indicates that the subject report has been reduced from a full ground water sampling report to a submittal of only analytical data summary tables. EA indicated that additional figures and interpretation of results will be incorporated into a yearly report following the fourth quarter sampling event.

The proposal to submit the data quarterly and an interpretation of the results of ground water and surface water sampling in an annual report is acceptable to the NJDEP. However, the following shall be submitted for the May 1998 sampling event and shall be included with all future quarterly reports:

- ◆ Ground water contour maps for each hydrostratigraphic unit, and
- ◆ Contaminant isopleth maps for each hydrostratigraphic unit.

b. In the last paragraph on page 2, EA indicates that samples collected from 43BR, 44BR and 46BR had a pH greater than 11.

The Navy shall evaluate the integrity of monitor wells 43BR, 44BR and 46BR. It is common that high pH in ground water samples is the result of well grout leaking into the screened or open bore hole portion of the well. Failure of the grout seal can result in cross contamination, which would make analytical results from these wells suspect.

2. Table 1B – Summary of Storm Drain Water Analyses for Volatiles

a. Several of the storm drain samples, including ST27-SW-01 which is located approximately 2500 feet from Buildings 40 and 41, have elevated concentrations of trichloroethylene and its breakdown products, cis-1,2-dichloroethene and vinyl chloride. Judging from the data, contaminated ground water was still infiltrating the storm sewer system in May despite the remedial actions taken (i.e. West-End Drainage Ditch Extraction Well, repairs to the storm sewer). Depending on the results of the second quarterly sampling event, the design of the ground water remediation system may need to address this issue.

b. The Navy is comparing the storm sewer samples to the NJ Class IIA Ground Water Quality Criteria. This is not appropriate. The Navy shall compare the storm sewer results to the NJ Surface Water Quality Standards, N.J.A.C. 7:9B.

c. During future sampling events, the Navy shall collect a sample of surface water from the point at which the storm sewer discharges to the Gold Run (i.e. ST27).

908-665-2464