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NAWC WARMINSTER
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LETTER AND THE U S NAVY RESPONSE TO THE U S EPA REGION III COMMENTS
REGARDING THE DRAFT FINAL REMEDIAL INVESTIGATION/FEASIBILITY STUDY AT
NAWC WARMINSTER PA
12/22/1994
DEPARTMENT OF THE NAVY



DEPARTMENT OF THE NAVY

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

5090 IN REPLY REFER TO
Ser 2337/1821/OJM

DEC 22 1994

Mr. Darius Ostrauskas
United States Environmental Protection Agency
Region III
841 Chestnut Building
Philadelphia, PA 19107

Re: Naval Air Warfare Center (NAWC) Warminster, PA

Dear Mr. Ostrauskas:

In response to the EPA's letter of 08 November 1994 and in accordance with our Federal Facilities Agreement, the Navy's proposed schedule for completion of a draft final RI/FS is provided below. The dates shown for the interim milestones are based on completing a draft final RI/FS by 01 December 1995, a target agreed to by the BCT members at the 15 November 1994 meeting.

All remaining work falls under two categories: Focused RI and Phase III. Anything identified later (i.e., via the Environmental Baseline Report) will be covered under Phase III, as long as we can maintain the schedule for approving the work plan and starting the field work. The schedule is very aggressive in light of the amount of work that needs to be done, so there is not much flexibility for modifying it.

In addition to the listed milestones, EE/CAs will be performed for selected sites such as Site 4, Site 6, Area A, and Area D, during the spring of 1995, as soon as decisions are made regarding which sites are to be addressed in that manner.

In a letter dated 06 December 1994, the EPA requested that the Navy either include soil sampling during the Site 4 EE/CA field investigation or, as a cost effective measure, excavate the soil between the bottom of the trenches and bedrock and only sample the soil lateral to the trenches. In the event that removal action is the selected alternative, the Navy will remove the soil between the bottom of the trench and bedrock, if feasible, or will sample the soil both below and lateral to the trench after source removal. As a follow-up to discussions between Ms. Kathy Davies and Mr. Jeff Orient, hydrogeologists for the EPA and HNUS, respectively, concerning the need for geophysical surveys and a soil gas survey at Site 4, the Navy will modify the workplan to reflect these changes.

At this time, it is not known which other source areas will be addressed by an EE/CA. Since the draft field sampling plan for the Site 4 EE/CA already exists, there is no need to delay implementing it. If any other source areas can be better addressed by an EE/CA, they will proceed at their own pace, and be grouped into a single response action where appropriate.

Revised Draft Phase III RI/FS Work Plan (with approval to proceed with field work)	16 Jan 95
Completion of Phase III RI Field Work	01 Jun 95
Preliminary Phase III RI Risk Assessment	01 Aug 95
Draft Initial Screening of Alternatives*	15 Aug 95
Draft Phase III RI Report	01 Sep 95
Draft Phase III FS*	01 Oct 95
Final Phase III RI/FS	01 Dec 95

* for sites that do not follow the EE/CA path

The Focused RI for Groundwater will be completed as soon as the remaining field work is completed (offsite wells, possible 3rd pumping test). Due to offsite access limitations, a detailed time projection cannot be made for completion of this field work. In addition to the RI, a focused FS addressing groundwater associated with Areas "A" and "D" will be completed. It is anticipated that this RI/FS work will be completed in early to mid 1995.

This very aggressive schedule can be accomplished only with the continued coordinated efforts among the technical subgroup and BCT members that we have established over the last eighteen months. The key to this effort will be to proceed with field work on or about the projected date.

Please feel free to call me with any questions concerning these responses.

Sincerely,



Orlando J. Monaco
Remedial Project Manager
By direction of the Commanding Officer

Copy to:

NAWC Warminster, Mike Hunter

NAWC Warminster, Tom Ames

NAWC Warminster, Joe Cody

USEPA, Kathy Davies Phila, PA

PADER, David Kennedy Conshohocken, PA

USGS, Ron Sloto Malvern, PA

Halliburton/NUS Kevin Kilmartin Wayne, PA

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Dave Fennimore, Earth Data

Tony Bartolomeo, Pennoni Associates