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NASJRB WILLOW GROVE  
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LETTER AND U S NAVY RESPONSE TO U S EPA REGION III COMMENTS REGARDING  
PHASE 2 REMEDIAL INVESTIGATION SAMPLING AND ANALYSIS PLAN FOR SITE 12  
SOUTH LANDFILL NAS JRB WILLOW GROVE PA  
08/26/2011  
TETRA TECH NUS



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PHIL-24462

August 26, 2011

Project Number 02014

Ms. Lisa Cunningham (3HS11)  
United States Environmental Protection Agency (EPA)  
1650 Arch Street  
Philadelphia, Pennsylvania 19103

Reference: Contract No. N62470-08-D-1001  
Contract Task Order (CTO) No. WE05

Subject: Response to EPA Comments  
Phase II Remedial Investigation (RI) Sampling and Analysis Plan (SAP)  
Site 12 - South Landfill  
Naval Air Station Joint Reserve Base (NAS JRB) - Willow Grove  
Horsham, Pennsylvania

Dear Ms. Cunningham:

Tetra Tech is pleased to submit the following response to EPA's comments dated June 22, 2011 and July 18, 2011 and received on August 10, 2011 regarding the SAP for Site 12 - South Landfill at NAS JRB Willow Grove. These responses are provided on behalf of the Navy Base Realignment and Closure (BRAC) Program Management Office (PMO).

The EPA comments have been included with the response in bold below each comment:

### Comments from EPA's Hydrogeologist:

1. Figure 17-2, this figure indicates the presence of a transformer located in the northeast section of Site 12. Does this transformer contain PCBs or ever had PCBs in its transformer oil? Is there any visible staining below or near the transformer? If staining is present on the transformer may have once contained PCBs in the transformer oil, we recommend taking a few samples for PCBs only at or below the transformer or just off the pad under the transformer (in the direction in which surface water would flow).

This transformer is reported to have been installed around or after 1992, after efforts removed PCB transformers/equipment from service. It is reported to have a "non PCB" or "no PCB" label on the side since this was standard practice. Attempts were made to locate the transformer on August 15, but the site and surrounding area is overgrown with vegetation. The transformer will be located when vegetation dies back and is cleared for Site 12 field activities this fall and the condition/labeling of the transformer will be confirmed. The transformer is not in use at this time.

2. EPA is pleased to see that the Navy is going forward and attempting to speculate the chromium present at Site 12. Are there special handling protocols for sampling soil and groundwater for hexavalent chromium? Are there special preservation steps that need to be taken?

Sample handling for hexavalent chromium is detailed on Worksheet #19 in the SAP. Hexavalent chromium samples for soil are handled using the same procedures as applied to soils for total metals analysis. For aqueous samples, no preservatives are required for hexavalent chromium.



3. SAP Worksheet No. 16, Project Schedule/Timeline Table, update with the most current dates.

**The Worksheet will be updated in the final SAP.**

**Comments from EPA's Risk Assessor:**

1. Please explain why Regions 6 and 9 are being used as the Project Screening Level (PSL)? Region 3 RSLs should be the only PSL used since the risk assessment (if needed) will use the associated toxicity values found on the Region 3 RSL table. In addition, the RSL table is now considered the universal screening tool across all regions. When attempting to verify the soil PSLs, some of the HHRA PSLs could not be verified since the exact source (Region 3 or 6) could not be verified.

**The PSLs were derived from the Regional Screening Levels for Chemical Contaminants at Superfund Sites which was derived by Oak Ridge National Laboratory (ORNL) under an interagency agreement to update the EPA Region 3 RBC Table, the EPA Region 6 HHMSL Tables and the Region 9 PRG Table for use across all EPA Regions; the footnote references the derivation of the table. The values used for the PSLs were obtained from this table. The reference in the footnote can be revised for clarification, if needed.**

2. Page 53 of 149. The footnote indicates a dilution attenuation factor (DAF) of 20 will be applied. Please confirm the acceptance of the use of a DAF=20 by the EPA site assigned hydrogeologist.

**The use of a DAF of 20 was confirmed with the EPA hydrogeologist.**

3. Page 63 of 149. According to the RSL table (dated June 2011) the PSL for o-xylene should be 20 mg/kg.

**The RSL Table used for submittal of the draft SAP was dated November 2010. The table was revised in June 2011 after the SAP submittal. The PSL for o-xylene will be updated. In addition, all compounds presented in Worksheet #15 will be reviewed against the June 2011 RSL Table for any changes.**

I hope this response adequately addresses EPA's comments. Please do not hesitate to contact me if you have any questions.

Sincerely,

Andrew Frebowitz  
Project Manager

AF/nfs

- c: Jeffrey Dale (Navy BRAC PMO)  
Robert Lewandowski (Navy BRAC PMO)  
Mark Leipert (EPA Region 3)  
Linda Watson (EPA Region 3)  
Tim Sheehan (PADEP)  
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