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NASJRB WILLOW GROVE
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LETTER AND U S NAVY RESPONSE TO PENNSYLVANIA DEPARTMENT OF
ENVIRONMENTAL PROTECTION COMMENTS REGARDING DRAFT WORK PLAN FOR
BUILDING 21 LEAD INVESTIGATION NAS JRB WILLOW GROVE PA
09/06/2011
TETRA TECH NUS



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PHIL-24474

September 6, 2011

Project Number 02014

Mr. Thomas Sheehan
Environmental Cleanup Program
Pennsylvania Department of Environmental Protection
Southeast Regional Office
2 East Main Street
Norristown, Pennsylvania 19401

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

Subject: Response to PADEP Comments
Draft Work Plan
Building 21 - Lead Investigation
Naval Air Station Joint Reserve Base (NAS JRB) - Willow Grove
Horsham, Pennsylvania

Dear Mr. Sheehan:

Tetra Tech is pleased to submit the following response to PADEP's comments on the Building 21 Lead Inspection Work Plan received August 25, 2011. These responses are submitted on behalf of the Navy. The PADEP comments have been included with the response in bold below each comment.

Jessica Kasmari's comments:

1. Section 1, Page 1-2, Paragraph 1.3. I would like them to add the word standards after the sentence. "Building 21 sufficiently to design and plan any necessary remediation and closeout under Pennsylvania Act 2."

The requested addition will be made.

2. I would like to see an additional sample location at the NE corner of the electrical transformer.

A sample location will be added to the NE corner of the transformer in the approximate location where an elevated lead results was obtained from the 1995 sampling event.

3. I would like to have the sampling borings ID on the figure 4 presented, specifically related to SS11, I am assuming this is the sample in the drain area.

Sample identifiers will be added to Figure 4. SS11 is the sample in the drain.

4. In addition are PCB's a concern around the transformer area. Has this already been addressed? Will it be addressed?

The transformer on the pad does not contain PCBs. The transformer area was recently inspected and no evidence of staining on the pad or adjacent soil was observed; therefore, sampling for PCBs is not planned.



Tim Sheehan's comments:

1. Section 2.2 and Section 3.2.2. The plan does not specify the actual sampling method of the soils. Several methods are covered in the SOP. Which method(s) will be used? -- i.e. shovel, auger, soil core, split spoon, etc.

Samples will be collected using a decontaminated stainless steel hand auger; however, if subsurface conditions exist which preclude the use of an auger, a decontaminated stainless steel shovel will be used to obtain samples from the target depths. Sections 2.2 and 3.2.2 will be clarified.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Andrew Frebowitz', written over a horizontal line.

Andrew Frebowitz
Project Manager

AF/nls

Enclosure

c: Jeffrey Dale (Navy BRAC PMO)
Robert Lewandowski (Navy BRAC PMO)
Lisa Cunningham (EPA Region 3)
Jessica Kasmari (PADEP)
Glenn Wagner (Tetra Tech)
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