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APPLIED ENVIRO-TECH INCORPORATED

October 14, 1999

Mr. Emil Klawitter
Northern Division – NAUFAC
10 Industrial Highway
Code 1811/EK – Mail Stop 82
Lester, PA 19113-2090

RE: Comments, Draft Work Plan for the Characterization of CVOC Contamination at the former NIKE site

Dear Emil,

Applied Enviro-Tech, Inc. (Applied) has the following comments on the above referenced document:

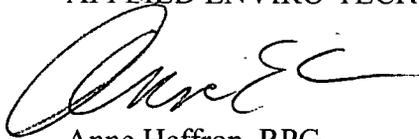
- 1) As part of this work plan a verification of potentially impacted residential wells should be conducted to insure all residential wells are accounted for. In addition all residential wells should be resampled as part of this effort.
- 2) An investigation into preferential pathways such as storm sewers should be incorporated into the proposed work plan.
- 3) Section 2.3 Site Area Hydrogeology, page 3. Contamination has clearly migrated to the north and northeast, not exclusively to the southeast as supported by previous groundwater elevation data. The residential wells are located to the north of the site and this workplan's primary objective needs to determine the transport mechanism with sufficient detail to evaluate any risk posed to the residential wells.

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- 4) Section 1.2, Bullet number four identifies further assessing natural attenuation as an objective of this workplan. A thorough evaluation of potential receptors i.e., residential wells, man-made structures affecting transport of contaminants such as storm sewers and a better definition of the site hydrogeology such as flow to the north should be fully assessed prior to evaluating natural attenuation.
- 5) Please define the criteria for decisions on the installation of the optional monitoring wells proposed in the work plan.

Please call at (401) 792-8260 if you have any question in regard to the above comments.

Sincerely,
APPLIED ENVIRO-TECH, INC.



Anne Heffron, RPG
TAG Consultant

CC: Betsy Morrison

AEH/las