



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107-4431

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NAWC WARMINSTER
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MAY 17 1993

Mr. Orlando Monaco
Naval Facilities Engineering Command
Northern Division, Mailstop #82
Environmental Contracts Branch
10 Industrial Highway
Lester, Pennsylvania 19113

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

Dear Mr. Monaco:

In this letter, the EPA requests the Navy to perform the following CERCLA actions at the subject site.

a. On May 14, 1993, the Navy collected a water sample from the Martin residence at 1065 Azalea Drive. Mrs. Martin was present and it was evident she was pregnant. Mrs. Martin reported a recent analysis of their water found 27 ug/l of PCE. The Martin residence is located immediately next to the Smith residence at 1069 Azalea Drive, where the Navy has found PCE at 140 ug/l. Based on this information, the EPA requests the Navy to provide bottled water to the Martins within 2 days and water treatment for the entire Martin residence within 5 working days. In any other case where available data indicates VOC levels of health concern at the home of a pregnant woman, the EPA requests such a response by the Navy.

b. The Navy's sampling of the Wagner & Co. production well water prior to treatment indicated a TCE level of 700 ug/l. The EPA understands that a more recent water sample of another well on the Wagner & Sons property found TCE at 5 ug/l. Based on a discussion with Mr. Tony Parisi of Wagner & Co. on 5/14/93, the Navy still has not notified Wagner & Co. of the results of any Navy sampling of Wagner & Co. water. As noted in EPA letters to the Navy dated February 10, 1993 and April 15, 1993, the analytical results for water samples collected on Wagner property by the Navy should be reported to Wagner by the Navy. In addition, as requested in the forementioned letters, the Navy

should be evaluating the uses of groundwater at Wagner as necessary to determine whether any additional action is required under CERCLA or the NCP. Of particular interest is the potential use of untreated groundwater containing contaminants attributable to NAWC.

c. As requested in EPA letters to the Navy dated January 15, 1993 and February 10, 1993, the Navy should proceed with reconstructing or plugging wells on NAWC property as necessary to minimize groundwater contaminant migration. EPA's letter of February 10, 1993 requested a draft workplan for this task by April 9, 1993 and requested notification when a task order had been issued by the Navy to their contractor for performance of this work. At this time, the EPA has not received a draft workplan or been notified that preparation of the workplan is underway. Please notify the EPA regarding the status of this task within one week of your receipt of this letter.

d. The Community Relations Plan (CRP) for NAWC was last updated in 1989. Based on the significant level of CERCLA activity at NAWC in recent months and the interest of the community in this activity, the Community Relations Plan should be updated at this time. Please coordinate with Terri White of our staff regarding this matter and provide her a schedule for developing an updated CRP.

e. In a letter dated January 28, 1993, the Navy agreed to provide a draft Record of Decision (ROD) for Operable Unit 1 on May 5, 1993. As of this date, the EPA has not received a Draft ROD or been notified of an alternative draft ROD submission date. Please provide a draft ROD or notify our office ASAP regarding this matter. With regard to the ROD, at this time, the EPA prefers an alternative which includes discharge to the NAWC WWTP and/or direct discharge to surface water. The Navy should confirm ARARs for discharge to surface water can be met and that there are no potential access problems with regard to piping or other conveyance of treated water to the necessary discharge point.

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Should you have any questions or comments regarding the above,
please give me a call at 215-597-0549.

Sincerely,



Darius Ostrauskas
Remedial Project Manager

cc: Captain William McCracken
Hank Sokolowski
Ben Mykijewycz
David Kennedy, PADER

Attachment A

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: Draft Phase II RI Report,
US Naval Air Warfare (NAWC)

FROM: David M. Kargbo, Ph.D., Hydrogeologist
Technical Support Section (3HW13)

TO: Darius Ostrauskas, RPM
Federal Facilities Section (3HW71)

I have reviewed the draft RI report for the Naval Air Warfare Center (NAWC) and offer the following comments, which for the most part concentrate on Sites 1 to 3. This is because the ground water under and downgradient of these sites is more highly contaminated than the other sites.

The report presents data that I believe supports the idea that ground water contamination (overburden, shallow, and deep bedrock) is partly (if not all) a result of overlying sources within the NAWC property.

First, the main argument posed by NUS in the report to indicate that ground water in the bedrock aquifer is coming from sources other than within the NAWC property is the lack of a hydrologic connection between the overburden aquifer and the shallow bedrock aquifer. While there may be artesian conditions in some areas, such condition may be lacking in other areas on-site. There is measured vertical downward flow in some on-site wells (Table 4-2, p.4-19). Please note that the Stockton Formation has been reported to behave as a multiple aquifer system (Sloto and Davis, 1983) with low permeability beds acting as confining units for highly permeable beds. However, water-bearing fractures may occur in both the confining and highly permeable beds with each zone having a different hydraulic head which may result in either a downward or upward head gradient. Changing vertical gradients were observed also and part of the report's interpretation for such occurrence includes the varying composition and degree of interconnection between the overburden and bedrock aquifers and the relative properties of previous and impervious surface cover at a given location (p. 4-16, last paragraph). This supports my contention that there may be discontinuities in the on-site semi-impermeable layer through which contamination may have migrated from the source area to ground water.

Second, with the realization that the low permeability beds are only partially confining and the presence of fractures, the downward flow may be caused in part by the pumping of wells whose radius of influence may extend to the site. In a long-term water