N62269.AR.000212
NAWC WARMINSTER
5090.3a

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

AUG 26 1994

Mr. Orlando Monaco
Naval Facilities Engineering Command
Code 0223
10 Industrial Highway, Mailstop #82
Lester, PA 19113

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

Dear Mr. Monaco:

This letter provides additional EPA comments on a Draft Phase III Remedial Investigation (RI) Work Plan ("Draft Work Plan") for the subject facility submitted to EPA on June 27, 1994. These comments were initially discussed during our Base Cleanup Team meeting of August 23, 1994. This letter summarizes and expands upon the comments discussed.

Aerial Photograph Interpretation

As requested in correspondence dating back to November 24, 1992, prior to scoping CERCLA RI work, all available aerial photo imagery should be inventoried and reviewed. The scope of RI work should then be supported by the documented results of this review and the inventory of photos should become part of the CERCLA Administrative Record.

The Draft Work Plan does not provide an inventory of photos in the NAWC archives or document the review of these photos. The Navy should conduct an inventory and review these photos, and revise the scope of the Draft Work Plan as needed. If no revision is needed, this should be documented.

Please note this letter does not comment on the effectiveness of any aerial photo review currently referenced in the Draft Work Plan.

Area D

In scoping RI work for Area D, the Draft Work Plan finds that "should ongoing groundwater investigation activities reveal that

the building is a potential significant source of contamination, a study will be performed to attempt to identify the locations and past uses of underground drain lines" and that "based on the findings of this study, additional source area work may be proposed." However, an EPA letter to the Navy dated May 11, 1994 has already requested the review of information regarding "drain lines" to be part of the RI scoping process for potential sources within Area D. Should the Navy believe the results of "ongoing groundwater investigation activities" for Area D (which are available at this time) indicate there is no need for such a review, please provide this documentation to EPA. Otherwise, th historic information regarding drain lines should be reviewed as previously requested. The Navy should also consider the results of these recent groundwater investigations in Area D in the RI scoping process.

A review of aerial photos and interview results (see comments below) should also be used to scope RI work for potential sources in Area D. One objective of this review should be to help define the aerial extent of Area D. While Figure 2-1 of the Draft Work Plan suggests that the area of Site 9 and Area D are synonymous, available information indicates that all NAWC property west of Jacksonville Road could be a potential source of groundwater contamination in on-base wells MP-1, MP-2, MP-3, SW-1 and SW-2, and monitoring wells located in the vicinity of Sites 1, 2 and 3. Based on this available information, Area D should include all NAWC property west of Jacksonville Road, excluding Sites 1, 2 and 3 (Area A). As a result, the review of background information (underground lines, interviews, aerial photos, etc.) for Area D should include all NAWC property west of Jacksonville Road. If this review indicates portions of this area are not a potential source of contamination, these portions may then be excluded from Area D.

Interviews

A review of interview results should be part of the RI scoping process for NAWC. However, the Draft Work Plan does not refer to the review of any interview results, nor is an inventory of interview results provided.

EPA has previously requested the Navy to conduct interviews with a representative group of current and former NAWC employees in letters dated January 5, 1993, October 26, 1993, and May 11, 1994. Despite these requests, EPA is not aware of having received any interview results from the Navy (with the exception of those regarding "CERFA-uncontaminated parcels" north of Bristol Road). In addition, EPA has specifically requested the results of an interview with Mr. Dick Law in letters to the Navy

dated September 10, 1993, October 20, 1993, and January 5, 1994. The Navy has not responded to any of these requests.

As noted in the previous correspondence, EPA cannot consider any RI Work Plan addressing potential sources of contamination attributable to NAWC to be complete if these requests are not addressed.

Page 2-35 of the Draft Work Plan does indicate "the Navy is preparing a report describing historical interviews with base personnel regarding past operations in the vicinity of Area D". The results of these interviews should be used to scope RI work for Area D.

General

As discussed during the BCT meeting, the entire NAWC property is a CERCLA National Priorities List site. Given this is the case, the objective of the Draft Work Plan is unclear. Section 1.1 of the Draft Work Plan states that the "purpose of this work plan is to discuss the scope of the Phase III RI" and that "although all sites have been investigated as part of the RI process, this workplan addresses deeper groundwater, soils, surface water and sediment contamination attributable to the base." However, many questions arise from these statements. Is the purpose of the Draft Work Plan to describe the scope of all remaining investigation work required by CERCLA for NAWC? Or is the purpose to describe all remaining RI work required by CERCLA for Installation Restoration (IR) Sites 1 through 8 and Area D? If the answer to this last question is yes, what CERCLA investigation work is planned for the balance of NAWC and how will this work be scoped? Is any CERCLA Site Assessment work planned for areas outside of IR Sites 1 through 8 and Area D? What is the role, if any, of the Phase II Environmental Baseline Survey (EBS) in performing Site Assessments and/or other investigations required by CERCLA?

Without answers to the questions, EPA cannot comment on the completeness of the Draft Work Plan. As discussed, these questions should be resolved in the BRAC Cleanup Plan (BCP), which should be revised by the BCT to assure that all requirements of BRAC and CERCLA will be met at NAWC. As a member of the BCT, EPA looks forward to working with the Navy and the Pennsylvania Department of Environmental Resources in revising the BCP to meet these objectives.

While many of the comments above request a complete a review of background information and a revised scope of the proposed RI

work based on this review, EPA plans to provide comments on the investigation procedures proposed in the Draft Work Plan during a meeting of the Technical Subcommittee of the Restoration Advisory Board on September 9, 1994.

Should you have any questions or comments regarding the above, please give me a call.

Sincerely,

Darius Ostrauskas
Remedial Project Manager

cc: Tom Ames, NAWC
Rod Warner, NORTHDIV
David Kennedy, FADER
Andy Rola, B & V
Kathy Davies
Andy Sochanski
Ben Mykijewycz