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

NOV 28 1995

Mr. Orlando Monaco
Naval Facilities Engineering Command
Environmental Contracts Branch
10 Industrial Highway
Lester, Pennsylvania 19113

Re: Naval Air Warfare Center (NAWC), PA

Dear Mr. Monaco:

The purpose of this letter is to transmit: (1) initial EPA comments on a "Draft Area D Remedial Investigation Work Plan" prepared by Brown and Root Environmental under cover letter dated November 9, 1995, and (2) EPA comments on a "Proposed Surface Soil Investigation for Aircraft Test Site" prepared by Brown and Root Environmental and dated October 30, 1995.

DRAFT AREA D RI WORKPLAN

1.0 Introduction

It is indicated that the RI will investigate the nature and extent of all hazardous substance releases at the facility that are not regulated and are not being investigated under the authority of...RCRA..." However, based on a preliminary review of RCRA file information for NAWC, it appears that some of the investigation work proposed serves to meet the RCRA requirements which are applicable to NAWC. For example, the RI addresses the former plating shop, which generated a listed RCRA hazardous waste from the years 1980 to 1984 and therefore may be considered a Solid Waste Management Unit (SWMU) under RCRA.

1.1 Purpose

It is stated that in the subject workplan, "investigation activities are also included for suspected sources within Area D that are generally not addressed under the base-wide Environmental Baseline Survey (EBS) currently underway." Please recall that EPA does not consider the Basewide EBS issued by the Navy in March 1995 to be complete and does not consider this document to identify or provide adequate information regarding all "suspected sources" within Area D. Since this workplan (as well as the EBS Screening Matrix) cites the Basewide EBS of March 1995 as the source of background information regarding potential

contaminant sources in Area D, it is possible that there are additional contaminant sources which have not been identified and are not targeted for investigation under the EBS or this workplan.

Areas formerly used for aircraft manufacturing and modification purposes are an example of areas within Area D where background information is inadequate to determine whether the proposed investigation will determine the source of groundwater contamination underlying Area D. For example, EPA has not been provided (1) the actual locations of historic aircraft manufacturing and modification work within Buildings 1, 2, or 4, (2) the location of drains and sewers directly under these areas as well as elsewhere under Buildings 1, 2, and 4, (3) information regarding the maintenance, upgrade or repair of sewers underlying Buildings 1 and 2, and 4, and (4) information regarding the purchase, generation, storage, treatment and disposal of solvents prior to the effect of RCRA (i.e., prior to 1980). For example, no information has been provided regarding the disposal methods for waste solvents generated within Buildings 1, 2, and 4, prior to 1980.

PROPOSED SURFACE SOIL INVESTIGATION FOR AIRCRAFT CRASH SITE

The subject letter proposes the analysis of soil samples for BTEX compounds only. Based on the information presented, it is unclear whether this analysis alone is adequate to confirm that the subject release of aviation fuel does not present a health threat. Based on a toxicological review of components of aviation fuel, the Navy should determine whether an analysis for Gas Range Organics or a similar analysis is advisable to make this confirmation. Please advise us of your determination prior to conducting the subject sampling.

Should you have any questions or comments, please let me know.

Sincerely,



Darius Ostrauskas
Remedial Project Manager

cc: Tom Ames, NAWC
David Kennedy, PADEP