



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

FIELD OPERATIONS
ENVIRONMENTAL CLEANUP PROGRAM
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March 9, 1993

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

Dear Mr. Monaco:

The Department has reviewed the Draft Focused Feasibility Study (FFS) for the first operable unit (OU1) at the Naval Air Warfare Center in Warminster, PA, and offers the following comments.

Page ES-1 (and restated elsewhere in the report) states that this study will only focus on the on-site groundwater contamination in the overburden and shallow bedrock. The report construes on-site as only the property now on the NAWC itself. Hazardous waste sites can not be defined by property lines, rather, a site must encompass the entire area of contamination. We understand that at present not enough is known about groundwater contamination beyond the NAWC boundary, but feel strongly that this too must be remediated as part of OU1 rather than leaving it for a later action. We suggest that while studies are being conducted for the design of the OU1 remediation a thorough investigation of the groundwater beyond the NAWC be undertaken. The results of this study should be incorporated into the eventual cleanup action.

Page ES-2 further expands on the Navy's position that this operable unit is only a portion of OU1 and that there will be another, fuller OU1 later. Since each operable unit requires a Record of Decision it would be much faster to have as few as possible. To have more than one OU1 (Interims and final) and possibly to follow the same procedure for other media (deep groundwater, soils, etc.) makes an already unwieldy process even more difficult.

Page 2-28: The Pennsylvania groundwater ARAR based upon 25 PA



Code (Section 264.100) requires that groundwater be remediated to background levels. This significant ARAR is listed on page 2-28, but is not recorded on the table on pages 2-6 and 2-7.

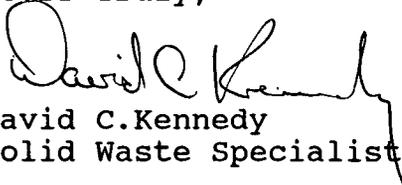
Pages 2-30 and 2-31 state that cleanup levels may be drinking water (MCL/MCLGs or risk based) or background. It should be emphasized that of these the lowest level should be the goal. If investigation should show that the background level is above any of the others, the most protective level would become the goal.

Page 2-51, Implementability. Control of off-gas emissions from air strippers would be required.

Pages 3-4 and 3-5. These maps show proposed lines of wells to collect contaminated groundwater. In the Draft Remedial Investigation report, figures 4-6, 4-24, 4-25, 6-22, and 6-23 show contamination beyond these proposed well lines. As a preliminary response these well locations may suffice, but as noted above, investigation and planning for a more comprehensive remediation as part of OU1 should be begun.

Thank you for the opportunity to comment on this Focused Feasibility Study. If I may be of help please call me at the above number.

Yours Truly,



David C. Kennedy
Solid Waste Specialist

cc. Mr Danyliw
Mr. Sheehan
Mr. Ostrauskas, EPA
HSCA file