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

MAR 18 1993

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

Dear Mr. Monaco:

Please find below preliminary EPA comments on a Draft Proposed Plan for Operable Unit One of the subject site submitted to EPA under letterhead dated March 9, 1992. These comments do not include those of EPA legal staff or comments on the "Summary of Site Risks" section.

Under "NAVY ANNOUNCES PROPOSED PLAN"

The document should be called a "Proposed Remedial Action Plan" (PRAP).

First paragraph: A second sentence should be inserted to read: "This Feasibility Study has been completed as part of the Navy's Installation Restoration Program and the Superfund remedial program."

First paragraph: Both in this paragraph and elsewhere in this section, the remedy or action should not be described as "interim". This term should be used only after it is defined later in the PRAP.

Second paragraph, first sentence: Should read: "This document is issued by the Navy, the lead agency for IRP and Superfund activities at the facility, and the EPA, the support agency for Superfund activities."

Third paragraph, first sentence, should read: "...responsibilities under the Superfund law, and in particular, Sections 113(k), 117(a) and 121(f) of the Comprehensive..."

Under "SITE BACKGROUND"

First paragraph

Figure 1 should be the Site Location Map (Figure 1-1) depicted on page 1-2 of Draft RI report.

Third paragraph

First sentence should read: "...the Superfund National Priorities..."

Second sentence should read: "This list includes those sites where uncontrolled hazardous waste releases may potentially present the most serious threat to human health and the environment."

This paragraph should reference the current Figure 1 for disposal area locations.

Fourth paragraph

First sentence should read: "...addressed under CERCLA in two phases."

Fourth sentence should read: "The eight (8) waste disposal locations were also investigated through soil borings..."

Fifth paragraph

A last sentence should be added to the paragraph re: Phase II to read: "Phase II also investigated the potential for groundwater in shallow bedrock underlying Area A to migrate to offsite locations, including deeper bedrock."

Sixth paragraph

The fourth bullet should be deleted and replaced with the following:

- A long-term water-level study combined with ground water quality data suggest contaminated groundwater in the shallow aquifer underlying Area A has migrated to deeper portions of the aquifer north of NAWC property

The fifth bullet should read:

- The full nature and extent of groundwater contamination caused by releases at NAWC are not known at this time. Additional groundwater investigation is necessary at both on and offsite locations.

Sixth bullet: Please delete.

SCOPE AND ROLE OF REMEDIAL ACTION

As indicated in previous correspondence from EPA to the Navy, the scope of the OU-1 interim remedial action cannot be limited to the NAWC property. As you are aware, Monitoring Well C, located on the NAWC property boundary, contains a TCE level of 2100 ug/l, the highest known level of TCE attributable to NAWC. Based on this data, groundwater in shallow bedrock underlying non-NAWC property(ies) immediately north of Well C is very likely to be contaminated by NAWC. As a result, monitoring wells must be installed on these properties to identify the nature and extent of NAWC-related groundwater contamination and to monitor the effectiveness of the extraction well network. In addition, to maximize the effectiveness of this network, extraction wells will most likely be required on these neighboring properties.

Based on the above, the first paragraph should be revised to read as follows:

"The objective of this Proposed Plan is to present remedial alternatives for all contaminated groundwater attributable to NAWC in overburden and shallow bedrock aquifers, including groundwater associated with Areas A and B. This portion of the site has been identified as Operable Unit One (OU-1). NAWC Warminster is being divided into Operable Units to help expedite the selection and implementation of actions necessary to protect human health and the environment.

The second paragraph should read:

"The Navy is proposing to conduct a remedial action to address contaminated overburden and shallow bedrock aquifers underlying Area A and B because this groundwater presents an unacceptable risk to human health and sufficient information is available to select a remedy. Available data indicates that shallow groundwater in the vicinity of Sites 4 and 8 does not present an unacceptable risk and does not require remediation, while additional investigations are needed to determine the full extent

of overburden and shallow bedrock aquifer contamination due to releases from NAWC."

The third paragraph should read:

"The objectives of the remedy in this case are to minimize the migration of contaminated groundwater in overburden and shallow bedrock aquifers, to initiate the restoration of these aquifers and to fully identify the nature and extent of contamination in these aquifers. A remedy with these objectives is considered an interim remedy. A final remedy for OU-1 will be selected after the full nature and extent of the problem is identified."

The fourth paragraph should read:

"Additional investigations to further identify the nature and extent of the contamination in overburden and shallow aquifers will be conducted by the Navy as part of the interim action for OU-1. Other media associated with NAWC shall be further investigated under the Remedial Investigation and Feasibility Study process. Further remedial actions will be proposed and selected as soon as adequate information exists to support the selection of a remedy. Additional media to be addressed as separate Operable Units include deeper bedrock aquifers and soils."

SUMMARY OF SITE RISKS

Title of Section should read "Summary of Risks for OU-1"

Additional comments to be provided.

SUMMARY OF ALTERNATIVES

Alternative 1: No Action with Groundwater Monitoring

See comments on Executive Summary of Draft FS

Alternative 2: Groundwater Extraction, Treatment and Discharge to Surface Water

See comments on Executive Summary of Draft FS

Alternative 3: Groundwater Extraction, Treatment and Discharge to

Wastewater Treatment Plant

See comments on Executive Summary of Draft FS

EVALUATION OF ALTERNATIVES

See FS comments.

As discussed with Ray Manella via telecon today, the EPA would like to meet with the Navy on March 22 and March 23, 1992 to develop a PRAP acceptable to the EPA and Navy RPMs. At that point, the draft PRAP can undergo legal and management reviews within the EPA and the Navy.

I look forward to talking with you tomorrow to discuss when we can meet.

Sincerely,



Darius Ostrauskas
Remedial Project Manager

cc: Ben Mykijewycz
David Kennedy, PADER