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

MAR 0 2 1995

**Mr. Orlando Monaco
Naval Facilities Engineering Command
Environmental Contracts Branch
Mailstop No. 82
10 Industrial Highway
Lester, Pennsylvania 19113**

R : Naval Air Warfare Center (NAWC)

Dear Mr. Monaco:

Please find below EPA comments on the Phase III RI Workplan for NAWC dated January 1995 as it applies to the soil gas survey for Area A and the footprint of OU-1 construction within Area A.

SOIL GAS SURVEY FOR AREA A

- 1. The aerial extent of soil gas survey should be expanded to encompass the area of the Industrial Wastewater Treatment Plant (IWWTP) and the jet fuel storage area, and should include the areas of Well SMP-2 (PCE detected at 130 ug/l) and RCRA Well D (PCE detected at 220 ug/l). (See Enclosure 1 for a map indicating the requested aerial extent of the soil gas survey in the IWWTP and jet fuel storage area. The eastern perimeter of this area is estimated. The actual eastern perimeter of this area should be sufficient to detect any releases from the jet fuel storage area.) The soil gas sample grid in this area should extend over the two current concrete impoundments and include the collection of soil gas samples under these two impoundments.**
- 2. The soil gas sample grid should be 25 feet for:**
 - a. all anomalies of concern identified in EM-31 survey**
 - b. the immediate area of all known or potential subsurface disposal sites otherwise identified by EPIC (see EPIC, January 1995 for coordinates of these sites), including the eight former lagoons (and the areas between these lagoons) and Pit-West, Pit-Center and Pit-East (the three apparent, former industrial waste treatment units)**

- c. the area of a spill adjacent to the far southeastern lagoon as identified in an aerial photo dated March 23, 1959 (see EPA letter to Tom Ames, NAWC BEC, dated February 22, 1995)
- d. the "footprint" of all OU-1 construction work
- e. along the industrial and sanitary sewer lines
- f. along the NAWC property boundary

Where buildings, pavement, underground utilities or storage tanks, or other obstacles are within the 50 foot grid for an area of concern (e.g., the area between well SMP-2 and the current industrial waste treatment building), the grid spacing should be adjusted (e.g., reduced) as necessary to properly assess the soil gas levels in the area of concern. Where available information suggests the potential presence of a significant source of volatile organic contamination (e.g., soils under the former unlined lagoons), soil gas samples should be collected below pavement.

3. If significant soil gas levels are detected at a sampling station(s) in the 50 foot grid, additional soil gas samples should be collected on a more refined grid radiating out from the station(s) of concern.

4. Based on the comments in this letter and prior to initiating the soil gas survey, the Navy should develop a map indicating the planned location of all soil gas samples within Area A and provide the map to the BRAC Cleanup Team. (Note: The Phase III RI W Rkplan currently does not provide any graphic information regarding the location of soil gas samples in the areas of Sites 2 and 3.)

5. At each soil gas sample location, soil gas samples should be collected at 2 to 3 feet in depth and at the soil/bedrock interface. Where saturated conditions are encountered above the soil/bedrock interface, the soil gas should be collected from soil immediately above the soil/saturated zone interface.

6. Soil gas samples collected in tedlar bags must be analyzed within four hours after collection into the bag. (Studies have shown that the tedlar bags leak after 4 hours.)

OU-1 CONSTRUCTION FOOTPRINT IN AREA A

1. As discussed, 60 ug/l of dissolved chromium has been detected in monitoring well MW-03. MW-03 apparently is located immediately west of the OU-1 treatment building footprint and appears to be sidegradient to groundwater flow under the building

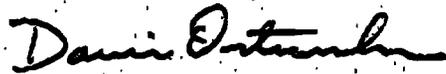
footprint and two former unlined lagoons underlying this footprint. At this time, there are no wells located downgradient of the footprint or the two former lagoons underlying the footprint. This and other available data suggest that soil underlying the two former lagoons and the building footprint may potentially be a source of unacceptable levels of hexavalent chromium in groundwater. As a result, the Navy should consider sampling of soil between the lagoon fill/natural soil interface and the soil/bedrock interface under the building footprint. The resultant data should then be evaluated prior to undertaking construction activities in the area of concern.

2. As requested in an EPA letter dated December 30, 1994, the actual location of surface soil samples should be based on historical information, including aerial photos, and identified on a map. Once this information is provided, the proposed number of soil samples can be assessed. In light of the schedule for OU-1 construction, the Navy should expedite the development of this map and the performance of subsequent surface soil sampling within the footprint of OU-1 construction.

3. The letter of December 30 requested the Navy to provide a map of subsurface soil sample locations and depths based on historical information and the results of the soil gas and geophysical surveys. Again, the Navy should expedite the development of this map and subsequent subsurface soil sampling within the OU-1 construction footprint.

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

Sincerely,

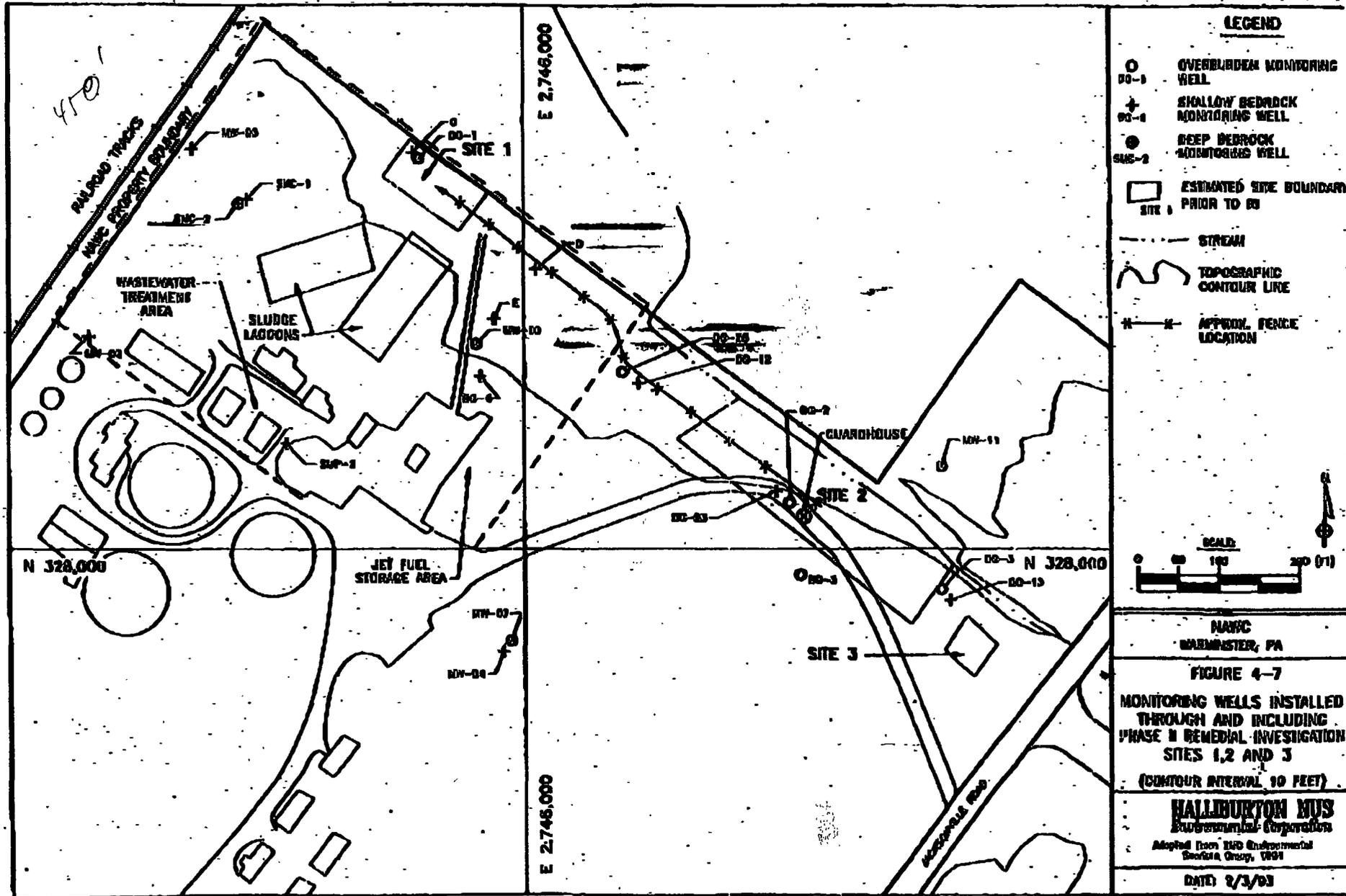


Darius Ostrauskas
Remedial Project Manager

cc: Tom Ames, NAWC
Kathy Davies
Ben Mykijewycz
Andy Rola, B & V
David Kennedy, PADER

Enclosure 1
 (to letter of March 2, 1995)

--- Boundary of aerial extent of soil gas survey
 in INWTP and fuel storage area



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FIGURE 4-7
 MONITORING WELLS INSTALLED
 THROUGH AND INCLUDING
 PHASE II REMEDIAL INVESTIGATION
 SITES 1, 2 AND 3
 (CONTOUR INTERVAL, 10 FEET)

HALLIBURTON MGS
 Environmental Corporation
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