

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

JUN 09 1995

Mr. Thomas Ames  
BRAC Environmental Coordinator  
Naval Air Warfare Center  
Aircraft Division  
Warminster, Pennsylvania 18974

Re: Naval Air Warfare Center, Warminster, PA

Dear Mr. Ames:

This letter regards the Navy's plans to construct a groundwater treatment building within Area A at NAWC. EPA understands the Navy will be transferring this property as part of the closure process for the Naval Air Warfare Center (NAWC). As you are aware, recent sample results for soils below the planned building location indicate elevated levels of metals.

At a Restoration Advisory Board meeting on May 18, 1995, the Navy indicated that plans were in place to construct the treatment building over soils of concern. EPA believes this decision is premature without the benefit of a risk assessment which determines whether these soils present a threat to human health or the environment. As discussed, as lead agency for CERCLA activities at NAWC, a CERCLA National Priorities List site, the Navy is obligated to complete a detailed risk assessment for these soils which meets CERCLA Remedial Investigation (RI) requirements. This risk assessment should include an assessment of any risk to groundwater quality and any risk to human health through potential "direct contact" exposure. To date, the Navy has not prepared such a risk assessment or released relevant RI information on these soils to the community.

Given the pending transfer this property, should the Navy plan to construct the treatment building without removing the soils of concern, EPA recommends the Navy (1) complete a "focused" risk assessment for the soils under the planned building location at this time, (2) include this risk assessment and all, relevant RI information regarding the subject soils in the CERCLA Administrative Record established for NAWC, and (3) provide the community an opportunity to review the risk assessment and RI information prior to proceeding with any construction work on the building. The Navy should then clearly communicate the rationale for any decisions regarding the soils under the building location

and the building construction through an effective community outreach program.

As an alternative, EPA encourages the Navy to consider removing the soils of concern below the building location at this time. This alternative may be more cost-effective than performing the testing, data evaluation and risk assessment necessary to demonstrate that the soils of concern do not present an unacceptable risk and conducting the community outreach program necessary to communicate this information. Instead, the community outreach program would be limited to communicating information regarding the nature of the action to be taken. In addition, this alternative would clearly eliminate the need for any future response actions in this case. These factors should be considered by the Navy, as well as the concerns of the community regarding of the future use of this property.

EPA looks forward to commenting on a draft version of the focused risk assessment should the Navy decide not to remove the soils of concern at this time. Should you have any questions or comments regarding the above, please call me at 215-597-0549.

Sincerely,



Darius Ostrauskas  
Remedial Project Manager

cc: Robert Finley, FLRA-BC  
David Kennedy, PADER  
Lonnie Monaco, NORTHDIV  
Bob Lewandowski, NORTHDIV  
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