

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

SEP 07 1995

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

Re: Naval Air Warfare Center (NAWC), Warminster, PA

Dear Mr. Monaco:

This letter provides EPA comments on an undated "Protocol for Testing of Excavated Soils". It is assumed that this is part of a more comprehensive plan describing the actions to be taken to address soil underlying the footprint of a treatment building to be constructed over former impoundment IM 8 within Area A.

**Zone 0-3 Feet:**

It is stated that "this zone is anticipated to consist of clean fill which has not contacted waste material". Any surface soil RI data which would help support this assumption should be referenced. It is stated that each stockpile will be sampled for "NEESA Level C TAL metals." It is not clear what this refers to. Because these soils overlie area known to have had a release of CERCLA hazardous substances, the sampling and analysis of these soils should be consistent with Level D procedures outlined in the Quality Assurance Project Plan (QAPP) for RI work at NAWC.

**Zone 3-5 Feet:**

Again, sampling and analysis should be consistent with QAPP for RI work at NAWC.

**Zone 5 Feet - Bedrock:**

As written, it is assumed that, in any case, all of this soil will be disposed at an offbase facility.

Please provide a full, final, dated plan for the subject work to EPA prior to proceeding with the work. Should you have any questions or comments, please give me a call.

Sincerely,



Darius Ostrauskas  
Remedial Project Manager

cc: David Kennedy, PADEP  
Tom Ames, NAWC