



U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NOAA CRC - USEPA Region III
841 Chestnut Building (3HW41)
Philadelphia, Pennsylvania 19107

April 14, 2000

Mr. Bruce Pluta (3HS41)
BTAG Coordinator
EPA - Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Re: Draft FS for Area A Media Other than Groundwater, Former
NAWC Warminster PA

Dear Mr. Pluta:

As BTAG lead for the former Naval Air Warfare Center (NAWC) Warminster, I am submitting the following comments for transmittal to the RPM, Darius Ostrauskas.

The Feasibility Study (FS) screens and evaluates remedial technologies and process options for Area A sediment located in an unnamed tributary of Little Neshaminy Creek. The technologies and process options which passed the screening process were combined to form remedial alternatives that will address site contamination. The remedial alternatives evaluated for sediment were no action and an environmental monitoring. Based on the evaluation of these alternatives, it appears that environmental monitoring is the preferred alternative. BTAG would support this alternative however is providing the following comments on the document.

The results of the ecological risk assessment for Area A indicate that sediments pose a potential for adverse effects to aquatic organisms and semi-aquatic organisms which use the habitat. The distribution of contamination within the area suggests contaminant input from base related activities. Sources of contaminants from the base to the tributary are not well characterized from a temporal (i.e. current or historical) or spatial/origination type perspective. However surface soils from Area A were evaluated as a potential source and preliminary remediation goals (PRG's) protective of the migration of surface soil to sediment were developed using a model. Several PAH's and metals results in surface soil (and subsurface soil) exceed these PRG's. However it is proposed in the document that the presence of a vegetated soil cover and drainage structure installed after recent soil removal actions and the Area A groundwater extraction well network have minimized the potential of migration. Furthermore, comparisons of soil concentrations to sediment concentrations and evaluations of the frequency of detection were conducted. Based on the information, the document proposes that there is no apparent need to address contaminated Area A surface soils to adequately protect stream sediment. BTAG disagrees with this proposal and suggests that the potential for contaminant migration from Area A surface (and subsurface soils) be included in the environmental monitoring, if selected as the preferred alternative. The analysis of the frequency of detection has not provided any information of the spatial extent of the contamination or the potential volume of contaminated soil. Furthermore, a vegetated soil cover is not a permanent feature and has not been included in the institutional controls. [On a related note, the presentation of the evaluation of Area A soils in the FS are somewhat confusing. Section 7.1.1 provides no discussion of the ecological issues associated with surface soils. Section

7.2.1 indicates soils were not addressed in the FS yet surface soil ecological PRG's are developed in Section 7.3]

The section on Applicable and Relevant and Appropriate Requirements (ARAR's), Section 7.2.2, is also confusing as to which ARAR's specifically apply to the sediment evaluation versus soils. Section 7.2.1 indicates that surface water and soils are not addressed in the FS, and that the FS is based on ecological receptors and the sediment media. The ARAR's section should be more specifically developed to address this concern; the majority of the ARAR's seem more pertinent to surface water or soils. If they are relevant to sediment remediation then they should clearly identify the issues for consideration.

The section on institutional controls (Section 7.4.3.3) is confusing as to how it applies to ecological risk issues in sediment. These appear to be oriented towards human health concerns with Area A soils.

On page 7-30, the argument is made that dredging (i.e. removal, treatment, disposal) would be ineffective in eliminating the opportunity for future sediments to become contaminated since the sources and transport processes have will not be addressed. Dredging would be effective in addressing historical releases from Area A. The report indicates that there is a contaminant signal in the vicinity of Area A and proposes that the migration pathway is largely historical. This discrepancy should be addressed. In addition, dredging is eliminated as an alternative due to this concern, issues with implementability, and the need for long term monitoring. The documentation that dredging is hard to implement is very weak and environmental monitoring appears to be the preferred alternative. BTAG is not saying that dredging should be the preferred alternative at this time, however it does appear to have been eliminated as an alternative prematurely.

Section 7.5.3 describes the Environmental Monitoring alternative. BTAG has participated in previous discussions regarding monitoring and has participated in scoping of monitoring activities. The scope and frequency of the monitoring presented does not reflect those discussions and appears to be more than what is required and is not decision oriented. BTAG recommends that the scope of the monitoring either be deleted from the FS or be revised to reflect the previous scoping discussions which have occurred.

If you have any questions or comments, contact me at (215) 814-5419.

Sincerely,

Simeon P. Hahn
Coastal Resource Coordinator