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REGION III  
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Mr. Orlando Monaco  
Naval Facilities Engineering Command  
Environmental Restoration Branch  
Mailstop No. 82  
10 Industrial Highway  
Lester, PA 19113-2090

MAY 11 1994

Re: NAWC - Proposed Source Investigations

Dear Mr. Monaco:

Please find below EPA comments on a RI Work Plan Addendum (hereafter referred to as the "WP") dated January 18, 1994, as it pertains to "Source Investigations" addressing Area C (Site 4 and Site 8) and Area D (Site 9 and the vicinity of Buildings 1, 2 and 3) and an associated, undated Scope of Work, Phase III RI, Source Area Studies outline (hereafter referred to as the "SOW"). For Sites 4 and 8, these comments are consistent with EPA comments on previous RI work in a letter from EPA to the Navy dated January 5, 1993.

In many cases, the WP does not address EPA comments in the letter of January 5, 1993. This letter is not referenced in the WP or SOW, suggesting these comments may not have been considered by the Navy.

Generally, the WP is below the standard of CERCLA RI Work Plans for other CERCLA NPL sites, including workplans prepared by the Halliburton-NUS Corporation. While EPA is committed to the goal of expediting the CERCLA process at this BRAC site to the extent practicable, the quality of the CERCLA RI workplans (and, as result, subsequent CERCLA RI work) should not be compromised in pursuing this goal.

#### 1.1 PURPOSE

##### Site 4

As suggested EPA letters dated October 26, 1993 and January 5, 1993, EPA recommends the Navy consider a Removal Action at Site 4 to address the buried wastes and/or any contaminants

associated with Site 4. Based on the WP, it is unknown whether the Navy is considering such a Removal Action.

If a Removal Action is being planned or considered, is the soil sampling described in the WP all that is planned, or is additional soil sampling planned during the Removal Action or during additional RI work after the Removal Action? Given available data already indicates the presence of uncontrolled CERCLA hazardous substances at Site 4, is any additional soil sampling needed prior to a Removal Action? The WP (and SOW) give no consideration to these questions.

EPA recommends the Navy develop a CERCLA/IR program strategy to address the buried waste and any associated contaminated soil at Site 4. Without such a strategy, the nature of any short-term soil/waste sampling at Site 4 cannot be determined. As a result, EPA will provide specific comments regarding additional source investigation work for Site 4 after this strategy and associated objectives and plans have been proposed by the Navy.

In a related matter, the WP currently states that "up to 10 test pits will be excavated at Site 4 to characterize the wastes deposited" and that "a sample of the most contaminated soil from each pit (based on field screening with an organic vapor detector) will be submitted for analysis for TCL VOCs." These two statements are apparently inconsistent. Does the Navy plan to sample "waste", soil or both? In addition, the "most contaminated soil" in a given pit may not be detectable with an organic vapor detector (e.g. toxic metals). Therefore, visual observations should also be used to determine sample locations.

Finally, if the objective of the sampling is to support the potential selection of a "no action" alternative, up to 10 samples for approximately 25,000 cubic yards of waste is clearly inadequate.

#### Site 8

It should be noted that both surface and subsurface soils need to be further characterized.

#### 2.0 ADDITIONAL BACKGROUND INFORMATION

As requested in numerous previous written correspondence from EPA to the Navy, in the case of all sites, available aerial photographs and interview results must be referenced and reviewed to help scope RI work. For example, listed below are the dates of aerial photograph provided by the EPA to the Navy for this purpose: 10/8/42, 10/27/50, 9/23/58, 9/29/58, 5/5/64, 7/26/64, 4/4/65, 8/7/71, 3/3/75, 5/22/78, 6/25/88. Should particular

photographs and or interviews provide no information, this should be stated. Where photographs and interviews do provide relevant information, this information should be noted and interpreted as needed to scope the RI work. There is no evidence of efforts to utilize these two important sources of background information.

The Previous Source Investigation/Characterization section should provide the detail necessary to assess the effectiveness and completeness of previous RI work. The details of previous RI work should be summarized as necessary and appropriate maps provided. At that point, data gaps can be identified and additional work scoped. This section should assess, for example, 1) whether previous soil gas screening and geophysical surveys were adequate to address the areas potentially affected given the results of the aerial photograph, interview review and other relevant information and 2) whether the nature of the soil gas screening was adequate to detect a potential significant release to subsurface soil.

#### AREA D

As previously discussed and reflected by numerous written previous correspondence from EPA to the Navy, an effective investigation of potential sources of Area D cannot be performed without a review of historic floor plans and drawings of the buildings, associated sewers, etc. For example, potential releases of solvents to floor drains of the former aircraft hanger by Brewster Aircraft prior to Navy ownership is of concern. Until this and other appropriate background information is reviewed, EPA cannot comment on the source investigations necessary to fully address Area D.

### 3.0 ADDITIONAL FIELD ACTIVITIES

#### Site 8

This section states that only berm soils will be sampled, while Section 4.0 indicates test pits will also be conducted at "hot spot areas previously identified through a soil gas survey". On the other hand, Section 2.1 suggests there was only one "soil gas hot spot" detected during previous RI work. What is a "hot-spot" and a "hot spot area"? Where are these "hot spots" or "hot spot areas" and were they previously detected only in berm soils? Are there any "non-berm" surface soil or subsurface soil samples actually planned?

The WP proposes to analyze for TCL VOCs in the "most contaminated soil from each pit", while the SOW proposes to collect "composite surface soil samples". Since composites are inappropriate for VOC samples, only grab samples should be collected in this case.

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What is the basis for "up to four test pits"? Under what circumstances would there be less test pits?

The comments above can also be utilized to guide the Navy's development of a Draft Work Plan for source investigations at Areas A and B. EPA looks forward to discussing the comments above with the Base Cleanup Team at a meeting on Friday, May 13.

Sincerely,



Darius Ostrauskas  
Remedial Project Manager

cc: Tom Ames, NAWC  
David Kennedy, DER  
Kathy Davies  
Ben Mykijewycz