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

DEC 6 1994

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

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

Dear Mr. Monaco:

Please find below EPA comments on the following recent Navy documents regarding the subject site:

Draft Field Sampling Plan for Site 4 RI/CA Field Investigation, submitted to EPA by Halliburton NUS under cover letter dated November 17, 1994

a. In a letter dated November 8, 1994, EPA has requested the Navy to propose to EPA, by mid-December 1994, a schedule for completing a Draft Final RI/FS for NAWC. EPA understands the Navy will likely propose a completion date of December 1, 1995. This completion date should be considered in developing any sampling plan for contaminant sources within Site 4. The subject Draft Field Sampling Plan ("Draft Plan") does not appear to consider this completion date and does not otherwise describe how the proposed work (or work to be performed under the planned response action) will ensure this completion date is met for contaminant sources at Site 4. In particular, the Draft Plan does not include soil sampling and does not indicate when such sampling would be conducted. This implies that 1) sampling to meet RI requirements for surface and subsurface soil at Site 4 will be part of future RI work or 2) these soils will be sampled as necessary during the response action to confirm the action is fully protective of human health and the environment (i.e., provides a permanent remedy per CERCLA remedial action requirements). Given the projected completion date for the Draft Final RI/FS, it appears the necessary soil sampling cannot be performed as part of

future RI work. In this case, the proposed Draft Plan and/or the response action should include the sampling necessary to meet all CERCLA requirements for soil at Site 4.

b. According to Figure 3-5 in the RI Report for OU-3, the depth from ground surface to bedrock within Site 4 is generally about five feet. If this is the case, the quantity of soil below the buried waste may be minimal, and as a result, excavation of any soil between the bottom of the trench and bedrock may be more cost-effective than sampling of this soil to demonstrate that no further CERCLA action is necessary. However, it is expected that some sampling of soils lateral to the trenches will be required in any case.

c. The Field Procedures (Sec. 2.0) state that "based on previous site reconnaissance activities, it appears that the disposal trenches can be readily located visually." While this may be the case, a geophysical survey should be performed to establish the actual trench locations. Based on the results of the geophysical survey, a soil gas survey should then be conducted to identify where elevated levels of VOCs may be present, and as a result, where intrusive activities such as test pits or waste excavation may release previously immobile VOCs to groundwater. (This procedure should be included as part of the investigation of any site at NAWC where there has been potential subsurface disposal.) A plan for each survey should be submitted to EPA for review and comment. A revised Draft Plan should then be prepared based on the survey results. In addition to test pits, th revised Draft Plan should consider the use of other intrusive investigation methods.

d. In addition to Site 4, trenches with buried waste (and associated contaminated soil) are located (or are potentially located) at other sites on NAWC property. As discussed, EPA will be providing the Navy the coordinates of all trenches appearing in available aerial photos. At this time, it appears that an expedited response action is being considered only for the trenches at Site 4, apparantly due to the extent of available information relative to the other trenches. However, prior to proceeding on the completion of an EECA addressing only the trenches at Site 4, the Navy should consider consolidating response work for all trenches of concern at NAWC into a single response action.

Draft Technical Memorandum: Surface Water and Sediment Sample Locations and Analyses, submitted to EPA by Halliburton NUS under cover letter dated November 4, 1994.

1.0 Surface and Sediment Sampling Study Areas

N rationale is provided regarding the lack of proposed sampling for Area D, which is also being addressed by the CERCLA RI for NAWC. An appropriate rationale should be provided.

1.3 Area B (Sites 5, 6 and 7)

One sediment sample and one surface water sample (if possible) should be collected at Outfall OF-10. Laboratory space should be reserved for three additional sediment samples and three additional surface water samples at Area B. These additional samples may be collected based on field observations the day(s) of sampling and should include analysis for VOCs and metals.

Please provide EPA two weeks notice prior to initiating the sampling of concern. This will provide EPA an opportunity to have a representative present during sampling.

Proposed Off-Base Wells for Round 6 Testing Program, submitted t EPA by Halliburton NUS under cover letter dated November 11, 1994

As discussed during a BRAC Cleanup Team (BCT) meeting on November 29, 1994, the sampling should be as proposed, with the following exceptions:

1. Add sampling of all wells on Catherine and Mary Sts.
2. Add sampling of Werner Park well

Proposed Monitoring Wells for Perimeter Testing, submitted to EPA by Halliburton NUS under cover letter dated November 23, 1994

As discussed during the BCT meeting of November 29, at this time, we request the "perimeter testing" consist of sampling monitoring well cluster MW-16 on Louis Drive, and monitoring well clusters MW-10, MW-40, MW-41 and MW-43 on the southern perimeter of NAWC property. Sampling of these wells should be performed concurrently with the Round 6 Testing. As discussed, we suggest that any longer-term perimeter testing plans for NAWC be discussed by the Technical Subcommittee of the RAB.

In addition as discussed on November 29, please provide EPA 1) the results of the pump test for Area B ASAP, 2) conduct

additional water levels measurements during the Area C pump test per Kathy Davies' comments to Jeff Orient, and 3) complete the c nstruction of the two well clusters currently being constructed adjacent to Casey Village ASAP.

Please give me a call should you have any questions regarding the above. Otherwise, we look forward discussing any comments you may have.

Sincerely,

Darius Ostrauskas
Remedial Project Manager

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