



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

FIELD OPERATIONS - ENVIRONMENTAL CLEANUP

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Southeast Regional Office

Mr. Thomas C. Ames
BRAC Environmental Coordinator
Naval Air Warfare Center, Aircraft Division
Warminster, PA 19874

RE: Concurrence Letter
Naval Air Warfare Center Aircraft Division, Warminster
Operable Unit 3, Shallow Groundwater, Area C

Dear Mr. Ames:

The Department has reviewed the proposed Record of Decision for Operable Unit 3 of the CERCLA remedial response at the Naval Air Warfare Center, Warminster. We understand that the selected remedy consists of actions to restore contaminated groundwater attributable to area C and consists of the following elements:

- Installation, operation, and maintenance of groundwater extraction wells.
- Installation, operation, and maintenance of an onsite groundwater treatment system which includes precipitation, filtration, air stripping and carbon adsorption, and/or other necessary means of treatment.
- Periodic sampling of treated water to ensure the effectiveness of the treatment system.
- Discharge of treated water to an unnamed tributary of Little Neshaminy Creek.
- Installation, operation, and maintenance of vapor phase carbon extraction units, as necessary.
- Offsite treatment and/or disposal of solid residuals generated during water treatment.
- Monitoring of groundwater in monitoring wells and residential wells.



- Installation and periodic sampling of observation wells to ensure the effectiveness of the groundwater extraction wells.
- Periodic evaluation of hydrogeologic data to determine the effectiveness of the groundwater extraction wells.
- Modification of the groundwater extraction well system and/or groundwater treatment system as necessary based on periodic evaluations.

The Department concurs with the selected remedy for Operable Unit 3 as outlined above with the following conditions:

- The Department will be given the opportunity to concur with future decisions concerning subsequent actions, and to evaluate appropriate remedial alternatives to ensure compliance with Pennsylvania ARARs.
- The Department will be given the opportunity to concur with decisions related to the design of the remedial action to ensure compliance with Pennsylvania cleanup ARARs and design specific ARARs.
- The Department's position is that its design standards are ARARs pursuant to CERCLA Section 121 as amended by SARA, and will reserve our right to enforce these design standards.
- The Department will reserve the right and responsibility to take independent enforcement actions pursuant to State law.

Thank you for the opportunity to concur with this EPA Record of Decision. If you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,



Carol R. Collier
Regional Director

cc: Mr. Beitler
Mr. Feola
Mr. Danyliw
Mr. Sheehan
Mr. Apgar, DER Harrisburg
Mr. Oleweiler, DER Harrisburg

Mr. Ostrauskas, EPA Region III
file