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November 28, 2006

Mr. Lonnie Monaco
BRAC Program Management Office Northeast
4911 South Broad Street
Philadelphia, Pennsylvania 19112-1303

Via Email & Overnight Delivery

**Re: Draft Area C Source Assessment Work Plan
Former Naval Air Warfare Center (Ann's Choice Community)
Warminster, Pennsylvania
ATC Project Number 50.10238.9900**

Dear Mr. Monaco:

ATC Associates Inc. (ATC), on the behalf of Erickson Retirement Communities (ERC) and Ann's Choice, has reviewed the Draft Area C Source Assessment Work Plan (Work Plan) dated September 2006 and offer the following observations and/or comments:

1. The Work Plan is written as if Area C is still part of the Naval Air Warfare Center and has not been redeveloped. The Navy and their consultants must take into account that while Area C is part of the Former Naval Air Warfare Center (NAWC), the Former NAWC has been redeveloped into a thriving community. As such, quality of life factors (i.e. tenant parking, public perception, aesthetics, etc.) must be taken into account when developing any work plan for Area C, not to mention extensive coordination with ATC, ERC and Ann's Choice.
2. The proposed location of monitoring well HN-103S (Figure 3-1) appears to be in the area of old growth trees that ERC spent considerable time and money to preserve. At this time, ATC is requesting that this location be revised to preserve the old growth trees.
3. The proposed locations of monitoring wells HN-103S and HN-104S (Figure 3-1) appear to be adjacent to one of the Ann's Choice residential buildings. Due to their proximity to the residential building, ATC is requesting that these locations be revised.
4. The proposed 117 soil gas points (Section 3.2.3) are not acceptable to ERC or Ann's Choice. The proposed locations of these soil gas points (Figure 3-2) appear to be in the area of old growth trees discussed earlier, as well as in the parking lot that services the adjacent residential building. ATC does not see the value of conducting such a survey at this time, since the soils in this location (with the exception of the old growth tree area) have been extensively cut and regraded during construction activities at the site. Furthermore, at no time during these construction activities were any impacted soils, odors, etc. observed in this area. However, in the interest of cooperation, ERC and Ann's Choice would be amenable to a limited soil gas survey in the grassy area along the northeast portion of the parking lot, as well as in the grass medians in the parking lot.
5. Appendix A – Field Sampling Plan indicates that all “equipment involved in the field activities for this investigation will be decontaminated prior to, during, and after drilling and sampling activities...” (Section 4.7). However, there is no mention as to where the decontamination

activities will occur. In order to limit possible exposure, etc. to Ann's Choice residents, it would be preferred if the decontamination area be staged in a location chosen by ATC and ERC in the construction area associated with Lot 16 of Ann's Choice. Be advised that a majority of Lot 16 is currently in use and the decontamination area requirements and details need to be provided to and reviewed by ATC, ERC and Ann's Choice for impact against the current uses. Furthermore, the above referenced available portions of Lot 16 will only be available for a very limited duration.

6. Appendix A – Field Sampling Plan indicates that all “PPE [personal protective equipment] will be double bagged and placed in trash receptacles at the facility”. ATC would like clarification as to what “trash receptacles at the facility” the Field Sampling Plan is referring. ATC, ERC and Ann's Choice request that the trash receptacles be provided and maintained by the Navy and/or its consultants. Furthermore, these trash receptacles are to be collected and transported to the Navy's treatment plant for proper disposal at the end of each work day by the Navy and/or its consultants.
7. Appendix A – Field Sampling Plan indicates that all major equipment and sampling equipment decontamination fluids “will be containerized in...DOT approved 55-gallon drums. The drums will be staged on wooden pallets in an area established by TtNUS and the Navy”. ATC, ERC and Ann's Choice request that these waste containers be collected and transported to the Navy's treatment plant for proper disposal at the end of each work day. If this is not feasible, the drums must be stored in a secure area consisting of an eight (8) feet high, opaque fence with locking gate, to be provided, maintained and removed by the Navy and/or its consultants. The location of the fenced compound must be pre-approved by ATC, ERC and Ann's Choice. No containers will remain in this secure area for longer than ten (10) days.
8. Appendix A – Field Sampling Plan indicates that all “purge and development water will be handled by containerizing all water in 55-gallon drums... The development and purge water will be staged similar to decontamination fluids...”. We are requesting that all 55-gallon drums are collected from the wellhead (point of origin) and transported to the Navy's treatment plant for proper disposal at the end of each work day. If this is not feasible, the drums must be stored in a secure area consisting of an eight (8) feet high, opaque fence with locking gate, to be provided, maintained and removed by the Navy and/or its consultants. The location of the fenced compound must be pre-approved by ATC, ERC and Ann's Choice. No containers will remain in this secure area for longer than ten (10) days.
9. Appendix A – Field Sampling Plan indicates that all “soil cuttings will be containerized and handled in the same manner as the decontamination fluids.” We are requesting that all 55-gallon drums are moved from the well boring or soil gas point (point of origin) and transported to the Navy's treatment plant for proper disposal at the end of each work day. If this is not feasible, the drums must be stored in a secure area consisting of an eight (8) feet high, opaque fence with locking gate, to be provided, maintained and removed by the Navy and/or its consultants. The location of the fenced compound must be pre-approved by ATC, ERC and Ann's Choice. No containers will remain in this secure area for longer than ten (10) days.
10. Appendix C – Health and Safety Plan does not indicate how Ann's Choice residents will be alerted in the event of an emergency and/or evacuation. This procedure needs to be developed with ATC, ERC and Ann's Choice personnel prior to the start of the field work.

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11. Appendix C – Health and Safety Plan, Section 5.0 – Tasks/Hazards/Associated Control Measures does not address how the exclusion zone around a specific boring, etc. will be determined and maintained during field activities to prevent possible exposure to Ann's Choice residents.
12. The Work Plan only makes a quick mention of site restoration activities in the Field Sampling Plan. ATC, ERC and Ann's Choice expect full and complete restoration to any improvements and areas located on the Ann's Choice site to pre-assessment conditions by the Navy and/or its consultants in a timely manner. All restoration must be of workmanship and using materials acceptable to ATC, ERC and Ann's Choice. Please incorporate these requirements into the Work Plan.

In addition to the above observations and/or comments, ATC has enclosed As-Built drawings for the investigation area, per the Navy's request during the November 1, 2006 RAB meeting.

ATC, ERC and Ann's Choice thank you for this opportunity to review and comment on the draft Work Plan and we look forward to continued cooperation between our parties.

As always, if you should have any comments or questions regarding this matter, please do not hesitate to contact me at 610.313.3100 ext.495.

Sincerely,
ATC ASSOCIATES INC.



Christopher J. Candela
Division Manager
Environmental Management Services
Plymouth Meeting, PA

Attachments: Ann's Choice As-Built for the Investigation Area

cc: Ted Sirko – ERC – No Attachments (email only)
Dan Healey – ERC - No Attachments (email only) ,
Joseph LoCascio – Ann's Choice - No Attachments (email only)
Proj. file

