



**TETRA TECH NUS, INC.**

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PITT-12-06-037

December 23, 2006

Mr. Christopher J. Candela  
ATC Associates Inc.  
920 Germantown Pike, Suite 200  
Plymouth Meeting, Pennsylvania 19462-2453

Subject: Draft Area C Source Assessment Work Plan  
Former NAWC Warminster, Pennsylvania

Dear Chris:

The following are the Navy's responses to the comments that you provided via letter dated November 28, 2006 on the subject work plan. Both the original comments from ATC Associates Inc. and the Navy's responses are provided below.

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.

**Response:** The Navy recognizes that the land referred to as Area C is no longer part of the Naval Air Warfare Center; however, we retain this nomenclature for ease of discussion. The Navy intends to work with ATC, ERC, and Ann's Choice to minimize any disturbances created and to coordinate site investigation activities with them.

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.

**Response:** Based on the drawings provided by ATC, a well can be installed near the western corner of the parking lot while maintaining the same distance from the high-value trees (~40 ft) as is the case for the well that ATC drilled as a replacement for HN-23A. The Navy will work with ATC, ERC and Ann's Choice to select a suitable location within this area.

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.



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**Response:** The proposed locations are approximately 30 feet from any building and the Navy has successfully drilled and installed wells adjacent to residential and/or commercial buildings in the past with no damages incurred. The Navy will work with ATC, ERC and Ann's Choice to agree on the final drilling locations while still achieving the desired site investigation objectives.

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 regarded 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.

**Response:** The Navy appreciates ERC and Ann's Choice's decision to work with us to find an amenable solution to our investigation. In response to your concerns, the Navy proposes limited hand drilling and soil gas sampling be done beneath select portions of the paved parking area. We suggest that an initial soil gas survey be performed around the edges of the parking lot and in the median grassy areas (using a hand-operated drill and staying at least 30 feet from any high-value trees). The Navy will review the results and will discuss with ATC, ERC and Ann's Choice for consensus the need for any additional sampling points that the Navy feels are needed in paved areas.

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 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.

**Response:** The Navy will work with ATC, ERC and Ann's Choice to identify an acceptable decontamination area for site investigation activities.

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 disposal at the end of each work day by the Navy and/or its consultants.



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**Response:** Any trash receptacles required for this work will be provided by and maintained by the Navy. Any PPE generated by the Navy and its subcontractors will be removed from the site at the end of each day's activities.

7. Appendix A – Field Sampling Plan indicates that all major equipment and sampling equipment decontamination fluids “will be 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 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 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.

**Response:** Decontamination fluids will be collected and removed from the site at the end of each day.

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 decontamination fluid...”. 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.

**Response:** Purge and development water will be collected and removed from the site at the end of each day.

9. Appendix A – Field Sampling Plan indicated 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.

**Response:** Soil and rock cuttings will be collected and removed from the site at the end of each day.

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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**Response:** The Navy will work with ATC, ERC and Ann's Choice to develop a procedure for emergency alerts. The navy would also like to assure ATC, ERC and Ann's Choice that it is highly unlikely that such a situation would occur due to site investigation activities. It is requested that ATC, ERC and Ann's Choice provide the Navy with their current emergency notification procedure and/or the procedure that they would like the Navy to follow.

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.

**Response:** Any activities requiring an exclusion zone will be marked off using traffic-style cones (or similar devices) and warning tape. The exclusion zone will also be manned during site activities to ensure that unauthorized personnel don't inadvertently move into the exclusion zone. Information regarding this will be added to the HASP.

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.

**Response:** Language will be added to the Work Plan indicating that full site restoration will be performed in a timely manner.

If you have any questions regarding these responses, please do not hesitate to call me at (412) 921-8778 or Mr. Lonnie Monaco at (215) 897-4911.

Sincerely,

Jeffrey P. Orient, P.G.  
Project Manager

JPO/sic

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