



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 13
841 Chestnut Building
Philadelphia, Pennsylvania 19107-4431

OCT 20 1993

Mr. Orlando Monaco
Naval Facilities Engineering Command
Northern Division
Environmental Restoration Branch
10 Industrial Highway
Lester, Pennsylvania 19113

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

Dear Mr. Monaco:

This letter completes EPA comments on the Workplan for the Area B Hydrogeologic Investigation at NAWC at this time. Included are EPA comments on the proposed Sampling and Analysis Plan for the investigation.

The comments below address the Work Plan Addendum for Area B Hydrogeologic Investigation dated October 1993:

Task 3 - Monitoring Well Installation and Construction

As requested in an EPA letter to the Navy dated September 17, 1993, should a significant water-bearing zone not be found in the 100' to 150' interval, drilling should proceed as necessary for up to 50 additional feet to find such a zone. In addition, well development should be performed in a manner consistent with comments and references in the subject letter.

The specific nature of the 50/50 bentonite-chip and sand mix proposed for sealing open boreholes was not provided. EPA requests the opportunity to agree with the Navy regarding the nature of the material used to seal the boreholes prior to use of the material.

Task 4 - Media Sampling

EPA is in general agreement with the approximate number of groundwater samples proposed for semi-volatile, PCB/pesticide and metals analysis. However, the rationale for the proposed sample locations (indicated in Tables 4-3A and 4-3B) has not been

OPTIONAL FORM 99 (7-90)

FAX TRANSMITTAL

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To	NEIL T / JEFF O.	From	LOUISE MONACO
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provided. EPA requests the opportunity to agree with the Navy on the actual location of the subject samples prior to collection.

VOC analyses have been proposed for six (6) of seventeen (17) existing monitoring wells within the vicinity of Area B. The rationale for the proposed sample locations (see Table 4-3A) has not been provided. EPA requests the Navy collect groundwater samples for VOC analysis from all existing wells in the vicinity of Area B as part of the Area B Hydrogeologic Investigation. Combined with VOC analyses from the new wells, these analytical results will become part of the contaminant distribution data base needed to perform an effective Remedial Design/Remedial Action for OU-1.

As requested in an EPA letter to the Navy dated September 10, 1993, sampling of groundwater from a newly constructed well should be performed at least two weeks after the completion of the well development.

Task 10 - Aquifer Testing

Per an EPA letter to the Navy dated September 17, 1993, water level measurements should be performed as outlined in the subject letter to assess the impact of the pumping of the Northampton Township supply well on groundwater in the vicinity of Area B.

Quality Assurance Project Plan (QAPP)

A revised QAPP was not included in the subject Workplan Addendum, presumably to wait for EPA comments on the Sampling and Analysis Plan (see above).

The final QAPP should address EPA comments regarding Sampling Equipment and Protocols as included in an EPA letter to the Navy dated September 10, 1993.

Please address the comments above in a Final Workplan Addendum and QAPP for the Area B Hydrogeologic Investigation.

In a related matter, per the EPA letter to the Navy dated September 10, 1993, EPA requests the results of all recent interviews conducted by the Navy with current/former NAWC employees regarding past disposal activities by the Navy and/or other parties in the vicinity of Area B (and NAWC property) both on and off NAWC property. For example, EPA understands that Mr. Dick Law of NAWC was interviewed on May 20, 1993 regarding this matter. The EPA requires this information to investigate any

sources of hazardous substance contamination in the vicinity of
NAWC not attributable to NAWC.

Should you have any questions or comments, please call me at 215-
597-0549.

Sincerely,



Darius Ostrauskas
Remedial Project Manager

cc: Ben Mykijewycz, EPA
Mindi Snoparsky, EPA
Ron Sloto, USGS
Andy Rola, B & V