

MEMORANDUM

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NAWC WARMINSTER
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TO: Mr. Lonnie Monaco
Northern Division, Naval Facilities Engineering Command

FROM: Tony Bartolomeo, Pennoni Associates
Tony Sauder, Pennoni Associates
Dave Fennimore, Earth Data

DATE: December 19, 1996

RE: Site 6 Investigation
NAWC Warminster

We have reviewed the following document concerning Site 6.

Draft Supplemental Field Sampling Plan - Site 6 Investigation

We offer the following comments on behalf of Warminster Township, the Warminster Township Municipal Authority, and the Federal Lands Reuse Authority-Bucks County, Environmental Committee.

1. The additional sampling does not address the need to investigate those areas where drums were found and removed, but no additional removal is proposed, as for Trench TR6D and disposal area TR6G. These disposal areas should be investigated more thoroughly to determine if other wastes are buried in the vicinity that need to be removed.
2. Composite samples are proposed for analysis of TAL metals and TCL semi-volatiles. Some of the groupings involve four to five boring locations to prepare a composite. A hot spot may be shielded by mixing with less contaminated soils.
3. An investigation should be performed after removal of the construction debris to ensure that there was no waste deposited below the debris. The investigation should include both geophysical methods and sampling.
4. Benzene was detected in soil gas in the northwestern portion of disposal area TR6G that should be investigated. There is a mound or depression indicated by the contours in the northwestern portion of the aerial photo feature identified by EPIC which should be investigated. In fact, the shape of the EPIC feature shrinks from Figure 2-1 to Figure 3-1. There should be additional investigation to determine the nature of these features.
5. The introduction states that a risk assessment will be performed as part of the decision process. It is not clear in the body of the report how the additional investigation will help with a risk assessment.

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6. It is not clear from the report whether all of the trenches and pits identified in the EPIC aerial photo were investigated. Various labels are given to EM anomalies and surface depressions which may or may not correspond to trenches and pits identified in EPIC.

JAS/BB

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