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WARM 9608.002.01

Mr. Lonnie Monaco
Naval Facilities Engineering Command (NAVFACENGCOM)
Northern Division
Environmental Contracts Branch, Mail Stop No. 82
10 Industrial Highway
Lester, PA 19113

RE: Review Comments
Sites 6 & 7 RI/FS Reports
Former NAWC Warminster

Dear Mr. Monaco:

Pennoni Associates Inc. ("Pennoni"), on behalf of Warminster Township, has reviewed the reports entitled *Sites 6 & 7 Remedial Investigation* dated December 1998 and *Sites 6 & 7 Feasibility Report* dated January 1999 which were prepared by Tetra Tech NUS, Inc. Based on our review we offer the following comments:

1. The Pennsylvania Department of Environmental Protection ("PADEP") Act 2 standards are given a "to be considered" (TBC) status in the report rather than "applicable or relevant and appropriate requirements" (ARARs) status which would require compliance for Superfund. Yet there was no discussion in the FS report as to how these were considered in the evaluation of the alternatives. It is the Township's position that the PADEP standards be met for the properties which will be conveyed to the Township for parkland. The PADEP residential Statewide Health Standards are generally applied to recreational areas.
2. The FS Report lists compounds of concern ("COCs") for subsurface soils for each of the three zones and the entire site. This table does not appear in the RI risk assessment and the basis for selection of the COCs is not clear between the two reports.
3. Alternative 5 which is presented as the required work to meet residential standards proposes removing all potentially impacted soils from Sites 6 & 7. The limits of the proposed excavation are delineated with a broad

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stroke without consideration of where the residential criteria were actually exceeded. As a result, an enormous amount of excavation and removal is proposed with an estimated cost of \$28,000,000. A closer review of the data reveals that the majority of the elevated contaminants are actually associated with previously identified trenches. If the excavation and removal were limited to the disposal trenches and surficial soils where elevated compounds were detected, the residential criteria could be met with a more reasonable expenditure. The Township position is that the PADEP residential standard be met for future recreational use. It appears that the PADEP residential criteria could be met for an expenditure of small fraction of the Alternative 5 estimated cost.

4. The FS report stated that 20 percent of the soil in Alternative 5 was expected to be hazardous. This seems very high and the large volume of soil contributes to a high cost estimate for Alternative 5.
5. The institutional controls for Zones 1,2,3 in Alternatives 3 and 4 include permanent signs in the impacted area informing future park users that excavation is not permitted. This signage does not appear to be appropriate for a park area and should be considered in evaluating the alternatives.
6. Site 6 is located adjacent to a residential area which brings into question the 24 days per year maximum exposure used for the recreational risk assessment. The immediate vicinity of the recreational area would be seen as an extension to the backyard of some of the residents and would therefore be available for more frequent use than 24 days per year.

If you have any questions concerning the above, please do not hesitate to contact us.

Very Truly Yours,

PENNONI ASSOCIATES INC.



J. Anthony Sauder, P.E., P.G.
Senior Hydrogeologist



Kevin J. Davis, P.E.
Manager, Environmental Services

cc. Robert Camarata, Warminster Township