



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

July 7, 1998

Orlando Monaco
Naval Facilities Engineering Command
Environmental Contracts Branch
10 Industrial Highway
Lester, Pennsylvania 19113

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

Dear Mr. Monaco:

This letter provides EPA comments on additional investigations for Site 8 as described in a letter dated June 2, 1998, entitled "Proposed Supplemental Investigations for Sites 1, 2, 3, 8 and Area D".

The subject letter proposes to collect three additional surface soil samples at Site 8 at a depth within 2 feet of ground surface (see Figure 4 of the letter for locations). The objective of the samples is indicated as "evaluate extent of metals and PCBs".

The propose sampling appears to be a response to the results of previous sampling in the subject area which detected lead levels of 1000 mg/kg and 759 mg/kg in Phase III RI soil samples SS-08-12 and SS-08-13, respectively. In addition, 33.4 mg/kg arsenic was detected in the former sample. These samples were collected at 6" in depth and approximately 40 feet apart (see Figure 6-12 in Phase III RI report).

EPA understands that the property which was characterized by the subject samples is projected to be used for residential purposes. Based on this projected use and the subject data, EPA recommends that the soils exceeding 500 mg/kg lead and/or presenting an unacceptable carcinogenic risk due to arsenic concentrations should be excavated and removed from the site. As such, another objective of the proposed sampling should be to determine the extent of the soil removal required.

Based on available data, the subject contaminants appear to be the result of activities associated with "Structure S1" (again, see Figure 6-12) rather Site 8. At this time, EPA has no information regarding the use of hazardous substances at Structure S1. Before finalizing any sampling plan in this case, this and other relevant information regarding Structure S1 should be considered. This information should also be reported to support a FOST for this property. In terms of comments on the proposed sampling plan for this area, based on available information, 1) surface soil samples should also be collected east of the runway next to Structure S1, 2) additional soil

samples should be located 20 to 30 feet west of the western perimeter of the runway to determine the areal extent of the contamination and 3) samples should be collected at multiple depths to determine the depth of excavation required.

With regard to the balance of past EPA comments regarding the additional RI work at Site 8, the Tentatively Identified Compound (TIC) data you have since provided to EPA appears to support the conclusion that additional sampling for CERCLA hazardous substances at Site 8 is unnecessary. However, per previous EPA comments, TIC and any other data which indicates the release of petroleum products from Site 8 to soils or groundwater on NAWC property should be referenced in the public record, including any FOST and/or any deed entered into for transfer of the subject property.

Please advise us of your plans with regard to addressing the subject soils with elevated lead and arsenic and provide us an opportunity to comment on any revised sampling plan prior to performing any additional sampling.

Should you have any questions or comments regarding the above, please give me a call.

Sincerely,

Darius Ostrauskas

Remedial Project Manager