



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III -
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

February 10, 1999

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

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

Dear Mr. Monaco:

This letter provides EPA comments on Additional Site 8 Surface Soil Sampling dated February 1, 1999, and a Verification Sampling and Analysis Plan, Vicinity of Site 8 dated February 2, 1999. These letters were telefaxed to EPA on February 8, 1999.

(Note: The comments below assume the reasonably anticipated land use for the site does not include residential use.)

Additional Site 8 Surface Soil Sampling

Where there is no grass or topsoil, surface soil samples should be collected from 0 to 6" below ground surface. Where grass/topsoil is present, the sample should be collected immediately below the topsoil.

As previously requested, additional samples should be collected to ensure that contaminants of concern are not present at unacceptable levels in soils east of the runway. Recommended sample locations are provided the Attachment. Surface soil samples (per criteria identified above) and subsurface soil samples should be collected at each location. Subsurface soil samples may be collected via a hand auger advanced 3' or 4' in depth. Any observations indicative of potential contamination, e.g., odors, staining, etc., should be documented and subsurface soil samples be biased to the depth of such features or collected randomly at 2' to 4' in depth. Samples should be analyzed for lead, arsenic, vanadium and polynuclear aromatic hydrocarbons (PAHs).

Verification Sampling and Analysis Plan, Vicinity of Site 8

It is indicated a cleanup goal for arsenic of 38 ppm has been established by the BC7. This is not the case. The draft Phase III RI indicates that under the projected industrial use, the carcinogenic risk falls within the acceptable risk range. As a result, cleanup of arsenic, a carcinogen, is not required. In addition, while an assessment of "trespassing" pathway has not been completed at this time, the risk posed by carcinogens, including arsenic, under this scenario also appears likely to fall within the acceptable range.

As discussed previously, the runway next to the planned soil removal area contain "holes" with accumulations of "soil" similar in appearance to that targeted for removal. These soils should be removed to a depth of two feet or characterized to ensure they do not present a health threat.

Please give me a call if you have any questions.

Sincerely,

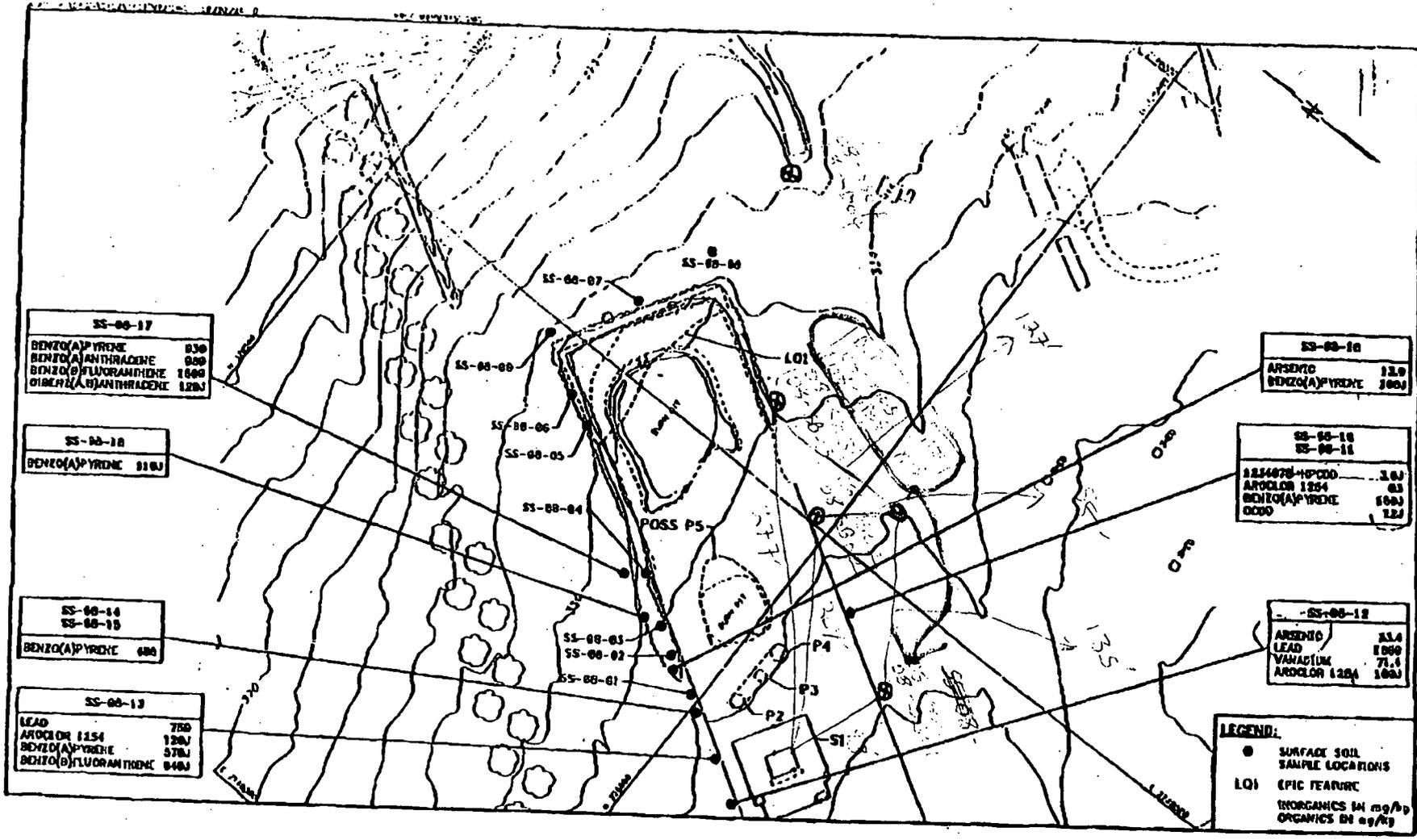


Darius Ostrauskas

Remedial Project Manager

Attachment

cc: Tom Ames, BEC/BTC



**CONCENTRATIONS EXCEEDING SCREENING CRITERIA
SURFACE SOIL SAMPLES
AREA C - SITE B
NANC. WARMINSTER, PA**



FIGURE 6-12
Brown & Root Environmental

*Recommended
Sample
Location*