



**COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES**

- Please note our new name -
**Department of Environmental Protection
D E P**
FIELD OPERATIONS - ENVIRONMENTAL CLEANUP
Suite 6010 - Lee Park
555 North Lane
Conshohocken, PA 19428
October 30, 1995

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Southeast Regional Office

Mr. James L. Colter, Remedial Project Manager
Northern Division, Naval Facilities Engineering Command
10 Industrial Highway, Mail Stop #82
Lester, PA 19113-2090

RE: NAS Willow Grove Phase 2 Remedial Investigation Conceptual Workplan

Dear Jim:

I have reviewed the conceptual work plan for the Phase 2 Remedial Investigation and offer the following comments:

- Sec. 1A: Text says that PCBs were detected in 13 samples, but on the map I can only count 10 (or 11 if allowing for a duplicate). Where were the other hits?
- Sec. 1C: Why was 10 ppm. chosen as the contaminant level of concern?
- Sec. 2C: Rather than installing temporary well points through the fill for one time water level measurements, you may wish to conduct long term data collection from a few points to determine the yearly high and low levels.
- Sec. 3C: Obtaining access for off base wells has proven to be a very time consuming process. To prevent future delays begin this process as soon as possible.
- Sec. 3C: Perform the long term water level study. Consider installing automated data loggers on the selected wells.
- Sec. 4C: While more wells downgradient from the 'hot spot' will help to determine where the plume may be going, consider installing a well or wells upgradient to determine the upgradient area of concern.
- Sec. 4C: If possible concentrate the soil boring sampling at the soil/bedrock interface. Most of the VOCs found are DNAPLs.
- Sec. 4C: Collect surface soil VOC samples from deeper than 2". At such a shallow depth any VOCs will have long evaporated.

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- Sec. 5C: What analyses are to be performed on the samples collected? Since this is a new site some of the samples should be fully characterized.

General Comment: A significant number of the analytical results noted in this proposed work plan show excessively high estimated ("J") values. While this could be due to an unusual occurrence in the lab, it could also be due to the wrong analytical protocols being used. We suggest that except for special situations EPA's Contract Lab Protocol (CLP) analyses be performed.

Thank you for the opportunity to comment on this conceptual work plan. I am looking forward to working with you and the EPA on the investigation and remediation of NAS Willow Grove. If I can be of any assistance, please do not hesitate to call.

Sincerely,



David C. Kennedy
Environmental Protection Specialist
Hazardous Sites Cleanup Program

cc: Mr. Danyliw
Mr. Sheehan
Mr. Drew Lausch, EPA Region III
file