

November 25, 1996

Mr. James L. Colter 1821/JLC  
Northern Division  
Naval Facilities Engineering Command  
10 Industrial Highway, Mailstop No. 82  
Lester, Pennsylvania 19113-2090

Re: Draft Phase II RI Work Plan  
NASJRB Willow Grove, PA

Dear Mr. Colter:

As a member of the Restoration Advisory Board, I have reviewed the above-referenced report. I have limited my comments to technical issues, points of clarity, and some obvious typographical mistakes.

Section 1.3.4 - State the depth to bedrock ranges at the site.

Section 1.3.5 - State the depth to water ranges at the site.

Top of Page 2-5 - "Detail logs will be kept . . ."

Top of Page 2-9 - "The annular space . . . sand to *at least 1 foot above* the top . . ." to keep consistent with SOP GH-1.7, pg 6.

Top of Page 2-9 - The presence of DNAPLs modifies grout, but no provision for changing to stainless steel screen is noted. Is PVC screen integrity a concern if DNAPLs are found?

Top of Page 2-10 - "If the well . . . pre-purging static water level." How long will you wait: hours, days? What if water level does not return to static?

Section 2.13.2 - Second sampling equipment rinse with DI water should be deleted if metals are not sampled.

Section 2.14.4 - "The purge water . . . volatile organic compounds (VOCs), *principally tetrachloroethylene (PCE)* . . ." The acronym "VOCs" is later used in Section 3.7.1. PCE identified as tetrachloroethane, not tetrachloroethylene; is this correct?

Section 3.2 - What is the Activity or activity?

Sections 3.4 and 3.5 - Reference to feet below ground surface (bgs) could be added for clarity.

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Section 3.7.2 - Clarify compounds as trichloroethylene or trichloroethane and tetrachloroethylene or tetrachloroethane. Text differs from Figures.

Section 3.7.3, Third paragraph - Explain a detection at 1J ug/kg? Is this an estimated concentration of 1 ug/kg?

Figures 3-2, 3-3 - Date(s) of sampling?

Figures 3-4, 4-2, 5-3, 5-4, 6-2 - Date(s) of sampling? Identify "J and B." PAH or Pah - be consistent.

Section 4.7.3, Second Paragraph - "Two semivolatile organics were detected *at concentrations less than the laboratory quantification limits* at . . ." Is bis(2-ethylhexyl) phthalate a common laboratory contaminant and a possible explanation for the detection?

Section 5.7.2, Second Paragraph - 1,1,1-Trichloroethane is typically abbreviated as 1,1,1-TCA or TCA, or was the compound 1,1,2-trichloroethane?

Section 5.7.3, Fourth Paragraph - Same comment about bis(2-ethylhexyl) phthalate "J" value.

Figures 5-2 - Date(s) of sampling? Identify "J and U." PAH or Pah - be consistent.

Section 5.7.3, Last Paragraph - Were dissolved inorganic concentrations ever greater than total inorganic concentrations? If so, why?

Section 7.1 - "*Whenever possible . . .*"

If you have any questions, please feel free to contact me.

Sincerely,



Eric C. Lindhult, P.E.

cc: Ms. Liz Gemmell  
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