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

April 18, 1997

Mr. James L. Colter
Department of the Navy Northern Division
Naval Facility Engineering Command
10 Industrial Highway
Mail Stop No. 82
Lester, PA 19113-2090

RE: Phase 2 Remedial Investigation Workplan

Dear Mr. Coulter:

EPA has reviewed the response to our most recent comments provided by Jack Dunleavy on April 7. Our comments follow. Where appropriate I have also documented follow-up conversations you and I have had regarding these issues.

In several instances the proposed locations for new wells were based on water level data collected during the Phase 1 RI. That data is now approximately 6 years old. In addition water level measurements at some of the Sites were taken over extended periods of time which causes EPA to question the data. Water level measuring events should be synoptic. We are recommending for sites 5 and 9 that current water level measurements be taken and groundwater contours be produced to assist in the location of certain Phase 2 monitoring wells.

I understand the Workplan (including objectives) for an investigation of the Tinius Olsen property adjacent to the Station will be a separate document. As you requested I have searched the CERCLIS data base for any entries related to that facility and did not find any.

EPA has requested that certain historical information be included in the Phase II Workplan and the Navy has responded "It was not an objective of the phase 2 RI to duplicate". It is not EPA's intent to unnecessarily duplicate existing work. EPA's opinion is that certain basic data should be in the Phase 2 Workplan. It is critical that

EPA (and other) reviewers evaluate the proposed work using the same data and conclusions as the author of the Workplan. While EPA was able to find the necessary information in documents previously published by the Navy it is questionable whether the public or subcontractors who may implement parts of the Workplan will have easy access to the information. Again it is not our intent to create work, but to help you produce a high quality Workplan.

In your response to our comment on 3.10.5 you state that the Phase 1 RI data will be evaluated in the human health risk assessment. EPA has not evaluated the Phase 1 data with regard to its usability in the risk assessment process. It is possible that additional sampling or analytical parameters will be recommended based on review of the Phase 1 RI data by the EPA toxicologist.

Regarding the location of wells for the Ninth Street Landfill site we have agreed that on May 5th the Navy, EPA, and PADEP would visit the site and locate the proposed well locations. EPA has requested that prior to that meeting the Navy collect synoptic water level samples from all existing wells at the site, and post the data on a site map. If possible the Navy should produce water level contours using the data. If the Navy cannot produce the contour map EPA's hydrogeologist can produce the contours on the 5th prior to visiting the site.

The Navy has added an additional well cluster to the proposed work at the Fire Training Area. EPA has suggested that installation of that well cluster be delayed until water levels are taken from all existing and "new" wells at that site and current groundwater contours based on current site conditions can be produced.

As a final comment, EPA suggests the Navy consider conducting a survey to identify offsite wells during the Phase 2 field activities. ATSDR has recommended this survey be conducted and EPA agrees that the information will be useful both to guide follow-on investigations (if needed) and as input to the risk assessment which will be developed for the site. EPA would not suggest sampling of the wells, just identification and collection of available construction details.

If you have any questions regarding these comments please call me at (215)566-3352.

Sincerely,

Steven R. Hirsh
Remedial Project Manager

cc: Kathy Davies, EPA