

October 11, 1998

Mr. James L. Colter  
Department of the Navy  
Northern Division  
10 Industrial Highway  
Mail Stop # 82  
Lester, Pennsylvania 19113-2090

Re: Comments to Draft Phase II Remedial Investigation Report  
Remediation Advisory Board  
NASJRB Willow Grove

Dear Jim:

I have a few comments on the draft report. They are:

Page ES-2 - Because all known PCB-containing soils are not being removed (<1 mg/kg), I suggest it be phased "[r]emoval of the most significant PCB-containing soil will essentially eliminate any possible future migration." I believe that this would be more accurate.

Page ES-8 and ES-18 - The referred Figure 1 does not show the locations. Suggest using Figure 1-2 from Page 1-4.

Page ES-9 - I was confused that the report states that soils range from 4- to 15-feet thick, but bedrock is generally found between 5 to 25 feet bgs (Page ES-10). What composes the 1- to 11-foot-thick difference between soil and bedrock? Is it weathered bedrock?

Page 4-9, 4-11, etc. - Figures references should be for Figure 4-21A, 21B, 21C, or 21D.

General Comment for Site 1 - Soil samples near the bowling alley that contain PCBs are sporadic and apparently at concentrations less than 10 mg/kg, except for the swale southwest of the bowling alley. The surface soil in the area appears to be mostly silts and clays, which will further reduce or eliminate concern of the PCBs migrating through the soil. Does the soil outside of the swale area (which does need to be removed) really need to be excavated for offsite disposal, or are other options more cost-effective, while being protective to human health and the environment (e.g., deed restriction, paved area)?

Please feel free to call me at (215) 830-2059 if you have questions.

Sincerely,



Eric C. Lindhult, P.E.