

Pennsylvania Department of Environmental Protection

Lee Park, Suite 6010
555 North Lane
Conshohocken, PA 19428
November 5, 2001

Southeast Regional Office

610-832-5949
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Mr. James L. Colter
Remedial Project Manager
Department of the Navy
Engineering Field Activity, Northeast
Naval Facilities Engineering Command
10 Industrial Highway
Mail Stop, No. 82
Lester, PA 19113-2090

Re: ECP – Storage Tanks
LRP ID No. 1-46-931-26925
Site 10, Navy Fuel Farm, NASJRB Willow Grove
Easton Road
Horsham Township
Montgomery County

Dear Mr. Colter:

The Pennsylvania Department of Environmental Protection (“the Department”) has completed review of the year 2000 system performance report for the vacuum-enhanced LNAPL and groundwater recovery and treatment system submitted in June 2001 by EA Engineering, Science, and Technology (“EA”) on behalf of the Department of the Navy (“the Navy”). As a result of the diminishing amounts of free petroleum product (“free product”) being recovered, the Department supports the decision to reevaluate the effectiveness of the remediation system. As discussed in the report, recovery of free product will continue on a quarterly basis and throughout the year during periods of low water table elevation and/or low rainfall via hand bailing methods. The Department also concurs with the idea to reassess impacts to the aquifer by conducting a round of area-wide groundwater sampling.

As mentioned in the cover letter enclosed with the report, the Navy is interested in closing out the site under Act 2. The Department is presently satisfied with the level of characterization with respect to volatile organic compounds (“VOCs”) in site soils. However, to date, it appears that no samples have been analyzed for total lead, one of the regulated substances on the Storage Tank Program’s short list for jet fuel releases. It is recommended that in order to complete characterization of the site that both soil and groundwater be tested for tetraethyl lead, a known jet fuel constituent that can be used to differentiate between naturally occurring and anthropogenic lead. With respect to the characterization of groundwater, the Department is also presently concerned that downward migration of dissolved-phase contaminants could take place in the aquifer underlying the fuel farm. Hydrogeologic investigations conducted at other areas of concern at the NASJRB have shown that a fairly pronounced downward vertical gradient does exist within the water table aquifer. The Department recommends that



well clusters be installed to both delineate the vertical extent of contamination and confirm or deny the presence of vertical hydraulic gradients within the water table aquifer. Please contact the undersigned before the scope of work is decided.

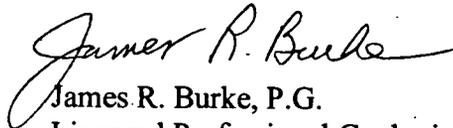
Please refer to the Land Recycling Program's Technical Guidance Manual ("TGM") for additional information related to standard selection and attainment demonstration procedures under the Act 2 Program. A link to the electronic version of the TGM can be found on the Land Recycling Homepage (<http://www.dep.state.pa.us/dep/deputate/airwaste/wm/landrecy/Vol.Clnup.htm>).

Thank you for the opportunity to comment on the work presented in the submitted document. If you have any questions in regard to these issues, please call me at 610-832-5940.

Sincerely,



M. Seth Pelepko
Geologic Trainee
Environmental Cleanup Program



James R. Burke, P.G.
Licensed Professional Geologist
Environmental Cleanup Program

cc: Mr. Reitenbach - EA Engineering, Science, and Technology
Mr. Burke
Mr. Day-Lewis
Mr. Pelepko
Re 30 (DC01)304-9