



24 September 2004

Mr. Yuriy Neboga
Pennsylvania Department of Environmental Protection (PADEP)
Southeast Regional Office
ECP-Special Projects Section
2 East Main Street
Norristown, PA 19401

Subject: Addendum (PADEP Requested Additional Information)
Final IR Site 10 Soil Letter Report to Support No Further Investigation at this Time,
NASJRB, Willow Grove, PA

Dear Mr. Neboga:

EA Engineering on behalf of Engineering Field Activity Northeast, EFA Northeast, Naval Facilities Engineering Command is providing additional information requested by PADEP in order for PADEP to make a final decision regarding the IR Site 10 Soil for no further investigation at this time. PADEP requested information of the current surface conditions of the locations of the former tanks (Tank 115, Tank 116, Waste Oil UST, Diesel UST) associated with past releases at IR Site 10. PADEP also requested additional information to demonstrate that the surface area (0 to 2 ft below ground surface (bgs)) of the former tank locations is clean either covered by hardscape and/or information that the soil has been removed. Figure 1 illustrates the current site conditions of IR Site 10 (Figure 1 also shows photograph locations). The photographs are enclosed following Figure 1. The information utilized to create Figure 1 is based on information obtained from EFA Northeast on 20 September 2004 via email and a site visit conducted by EA on 22 September 2004. The email along with the figure attached to the email is also enclosed with this letter. The figure attached to the email shows the former and current site elevations of the former tank locations. The approximate outer limit of the soil excavation associated with the removal of former Tanks 115 and 116 is shown on Figure 1 (information obtained from figure attached to the email). Former tanks 115 and 116 were on a concrete slab and partially buried. The former area of the tanks was at a higher elevation when the tanks 115 and 116 were present onsite (see email and attached email figure). Soil was excavated ranging from approximately 8 to 18 ft below the former elevation at former Tank 115 and approximately 10 to 18 ft at former Tank 116 to the concrete slab of each tank. The concrete slab of each tank remains onsite, however, the concrete slab is not visible today. Grass was planted to cover up the concrete slabs as shown in the enclosed photographs and on Figure 1. The approximate locations of the former waste oil and diesel USTs are currently covered by a concrete slab as shown on Figure 1 and on Photograph 5. In addition, the surface conditions of the remainder of the fuel farm is shown on Figure 1 along with the photographs. Note that the remainder of the Fuel Farm is covered by grass, concrete, and/or asphalt. No exposed soil surfaces were found onsite. In addition, piping and underground utilities are found throughout the site as shown of Figure 1 along



with the photographs. There is no other historic information available on IR Site 10 in terms of the removals of former tanks (Tank 115, Tank 116, waste oil UST, and diesel UST).

Based on the information presented in this letter along with the *Final IR Site 10 Soil Letter Report to Support No Further Investigation at this Time* (submitted to PADEP on 16 December 2003), EA on behalf EFA Northeast is requesting no further investigation at this time in relation to IR Site 10 soil. In summary the basis of this request is the following:

- Recent sampling of soil at accessible locations has shown no contamination exists,
- Contaminated soil was removed at the time the tanks were removed,
- Current locations of the former tanks is not accessible due to the site being a Fuel Farm (i.e. piping),
- Current site condition as stated above shows that there are no exposed soil surfaces, and

Finally, it is expected that NASJRB Willow Grove will remain an active military installation for the foreseeable future, supporting the premise that complete Act 2 demonstrations of attainment for each area of concern may be more appropriate at the time of a property transaction or significant change in land use at the IR Site 10 portion of the base. This information and the *Final IR Site 10 Soil Letter Report to Support No Further Investigation at this Time* provides the basis for a "no further investigation at this time" decision for IR Site 10 soil.

Please note the change of address in the above header. In addition, I will be out of the office from 29 September to the 15 October 2004 in the field. If you have any questions, please do not hesitate to call me on my cell at 302-540-1284.

Sincerely,

A handwritten signature in cursive script that reads "Maria J. Magilton".

Maria J. Magilton
Project Scientist

EA Project No.: 29600.74 6200

cc: J. Dale, EFA Northeast
E. Boyle, EFA Northeast
K. Sheedy, EA



Figure 1. Site Conditions

Scale (1 inch = 100 feet)



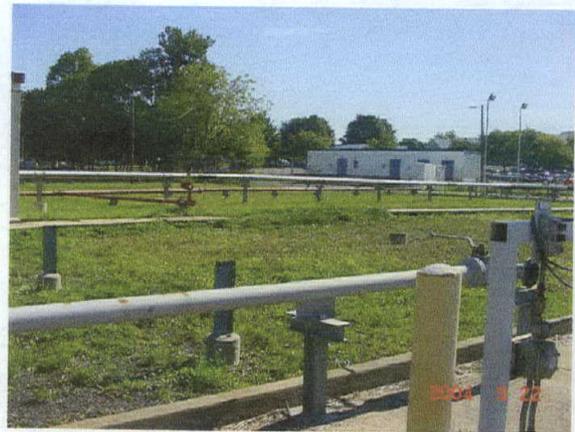
Photograph 1. Looking southeast at current fuel tanks in concrete and a portion of the location of former Tank 115 (grass over concrete slab).



Photograph 2. Looking southeast at the location of former Tank 115 (grass over concrete slab).



Photograph 3. Looking southeast at piping and the location of former Tank 116 (grass over concrete slab).



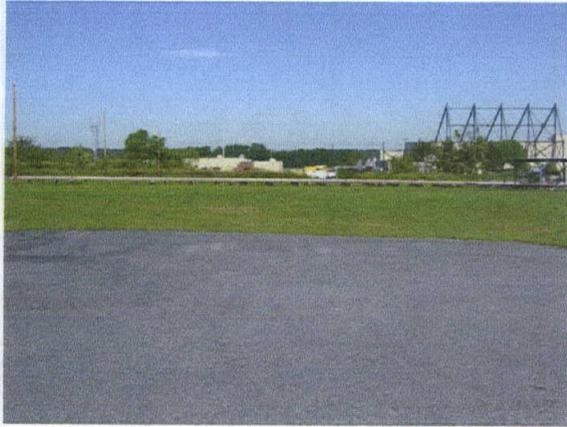
Photograph 4. Looking east at piping associated with the Fuel Farm which is adjacent to the location of former Tank 116.



Photograph 5. Looking northeast at asphalt surface leading to the approximate location of the former waste oil and diesel USTs (concrete slab).



Photograph 6. Looking northeast at portion of asphalt paved surface surrounding the Fuel Farm.



Photograph 7. Looking northwest at paved asphalt surface and the location of former Tank 116 (grass over concrete slab).



Photograph 8. Looking northwest at paved asphalt surface and piping adjacent to the current tanks.