April 11, 1988

Mr. T.G. Scheckels, Head
Restoration Management Section
Department of the Navy
Northern Division
Naval Facilities Engineering Command
Philadelphia, PA 19112-5094

Re: Industrial Waste
Willow Grove Naval Air Station
Horsham Township, Montgomery County

Dear Mr. Scheckels:

We have completed our review of the "Plan of Action for Site Inspection" prepared for the Department of the Navy, by EA Engineering, Science and Technology, Inc., dated February 1988.

The work plan is generally acceptable; however, the following comments should be addressed:

1. Groundwater monitoring will not be required in the abandoned rifle range No. 1 area at this time. We request copies of scientific literature or other data alluded to in the POA regarding lead (Pb) mobility. This information and groundwater data from rifle range No. 2 will be reviewed to determine whether monitoring wells are needed on this site.

2. Locations of sampling points appear satisfactory with the understanding that locations may change slightly due to actual field conditions.

3. During any of the proposed three rounds of sampling any encountered seeps or sheens on storm/surface or groundwaters (as in Navy Fuel Farm trench) should be sampled and analyzed. This is also suggested for any areas of stressed vegetation that may be encountered.

4. If wetlands or marshes can not be avoided for well drilling, encroachment permits from our Bureau of Dams and Waterway Management and possibly the Army Corps of Engineers may be needed.

5. Sampling of the unused Air Force supply well may not be sufficient (due to its depth) to assess whether paint and solvent storage in the well house has had an Impact; SVCA or soil sampling should be considered.

6. Soil borings in areas adjacent to UST's should be to a depth greater than the bottom of the UST to ensure that any leakage from the bottom of the tank would be detected.
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Underground storage tank (UST) systems are considered to be sources of potential pollution; we recommend removal of any unused UST system. If during removal, contaminated soils and/or groundwaters are detected, this office must be notified so that we can inspect the tank and excavation.

We understand that a final report will be generated in approximately 8 months; copies of this document should be submitted for our review.

Lastly, please notify us of dates of sampling and drilling at NAS in the event our staff wishes to observe or split samples.

If you have any questions regarding this matter, feel free to contact me.

Very truly yours,

Marilyn Shup
Water Quality Specialist Supervisor

cc: Mr. Bowling
    Mr. Danyliw
    Mr. Boyer
    Re 30 (SMC)98.3