November 9, 2010

Project Number 02014

Base Realignment and Closure
Program Management Office, Northeast
4911 South Broad Street
Philadelphia, Pennsylvania 19112-1303

Attn: Mr. Jeff Dale

Reference: Contract No. N62470-08-D-1001
Contract Task Order (CTO) No. WE05

Subject: Site 1 Land Use Controls - July 2010 Annual Inspection Report
NAS JRB Willow Grove, Pennsylvania

Dear Mr. Dale:

Tetra Tech NUS, Inc. (Tetra Tech) is pleased to provide this 2010 Letter Report documenting the status of compliance with the land use controls (LUCs) that have been placed by the Navy on Site 1 Groundwater at the NAS JRB Willow Grove, Pennsylvania. A description of the LUCs, along with a brief site description and the historical perspective, are contained in the Draft Remedial Design for Land Use Controls (RDLUC) for Site 1 Groundwater at the NAS JRB Willow Grove, Pennsylvania, dated February 2009 (Tetra Tech, 2009).

The RDLUC describes the program agreed to by the Navy, the US Environmental Protection Agency (EPA), and the Pennsylvania Department of Environmental Protection (PADEP) to ensure and document compliance with land use controls placed on Site 1 Groundwater (Operable Unit 3). Compliance monitoring includes on-site inspections of Site 1, interviews of property owner and workers, and completion of an Institutional Control Inspection Checklist. After completion of the "Physical On-Site Inspection" and "Interview Property Owner" portions of the checklist, the Navy signed the Annual Certification portion. The signed checklist is included in this RDLUC Annual Letter Report.

The Institutional Control Inspection Checklist provides verification of compliance with the land-use controls that were previously identified in a Record of Decision (ROD), or referenced in the Sampling and Analysis Plan for Groundwater Monitoring, and deed covenants. Site 1 Groundwater is addressed below, documenting the inspection findings, items of noncompliance, if any, and measures taken to correct the items of non-compliance during the year 2010. The Institutional Control Checklist is included as Attachment A.
The following land use controls have been placed on the designated land or areas while the interim ROD is in force for Site 1 groundwater:

- No new groundwater well(s) may be installed without written consent from EPA and PADEP.
- Access to existing and any additional groundwater monitoring wells, including supply wells, will be limited by the Navy or subsequent land owner to the organization responsible for groundwater monitoring.

Figure 1 identifies the area for land use limitations.

**On-Site Inspection**

In September 2009, a groundwater sampling event of periodic groundwater monitoring for Site 1 was conducted according to the Sampling and Analysis Plan for the Site 1 Groundwater Monitoring (Tetra Tech, July 2009). The annual institutional control on-site inspection of Site 1 was performed on July 20, 2010. No evidence of new groundwater wells was encountered during either site the groundwater monitoring event or the LUC inspection. However, new construction activities at Site 1 were underway by CLAYCO which is a contractor of the Air Force Reserve. Two damaged monitoring wells (01MW01S and 01MW02S) were found due to construction activities. The damage incurred to these wells was limited to the aboveground well riser and protective casing.

**Interview Property Owner**

On July 20, 2010, Bill Heil from the NAS JRB Willow Grove Environmental Division, confirmed that no permits, construction, directives, or other guidance had been issued that would change the use of site groundwater.

**Other Related Information**

An Army Reserve Training Center is under construction at Site 1. The drawing from U.S. Army Corps of Engineers indicates three monitoring wells of 01MW01 cluster would be abandoned and 01MW02 and 01MW03 clusters would be adjusted during construction of the Training Center (Figure 2). Monitoring wells 01MW01S and 01MW01SO are included in the sampling program for Site 1 periodic groundwater monitoring. However, the Navy has reached an agreement with the Air Force Reserve about monitoring wells 01MW01S and 01MW01SO, which must be replaced for Site 1 periodic groundwater monitoring as required by the Interim ROD for Site 1 groundwater.

Based on the data obtained for the RDLUC inspection, there was no non-compliance with the land use controls placed by the Navy on Site 1 groundwater. The Navy has communicated with the current property owner of Site 1 (the US Air Force Reserve) notifying them of current LUCs compliance status, reiterating the need for the replacement of monitoring wells 01MW01S and 01MW01SO, and requesting copies of closure documentation for any wells that have been closed.
If you have any questions or require revisions regarding this report, please do not hesitate to contact me.

Sincerely,

Russell E. Turner, P.E.
Project Manager

RT/nfs

Enclosure

c: Lisa Cunningham (EPA Region 3)
   Kathleen Patnode (EPA Region 3 BTAG)
   Charles Clark (PADEP)
   Bill Heil (NAS JRB Willow Grove)
   Executive Officer (NAS JRB Willow Grove)
   Horsham Township Library
   NAVFAC Mid-Atlantic Librarian
   Garth Glenn (Tetra Tech) (without enclosures)
   File
FIGURES
ATTACHMENT A

INSTITUTIONAL CONTROL INSPECTION CHECKLIST
INSTITUTIONAL CONTROL INSPECTION CHECKLIST

FOR LAND USE CONTROLS
SITE 1-PRIVET ROAD COMPOUND GROUNDWATER (OU 3)
NAS JRB WILLOW GROVE, HORSHAM TOWNSHIP, PENNSYLVANIA

A. Annual certification

Name: ROBERT F. LEWANDOWSKI
Affiliation: NAVY BRAC PROGRAM MANAGEMENT OFFICE
Signature: 
Date: 11/8/2010

B. Interview Property Owner

Person Interviewed: BILL HEIL (NAS JRB Willow Grove)
Date: 7/20/2010

Check as appropriate:

- No permit, construction, directives, or other guidance has been issued that would change the use of site groundwater.

Comments: Proposed Army Reserve Training Center will be constructed at Site 1. 0.1 MWD and 0.1 MWD+ were damaged due to construction activities. The new construction plan will interfere with the LC, and 5% groundwater monitoring.

- Changes have been made that may change the use of site groundwater

Comments:


C. Physical On-Site Inspection

Name: XUEJUN CHEN
Affiliation: Terra Tech NUS, Inc
Signature: 
Date: 7/20/2010
In accordance with the Land Use Controls of Site 1 Groundwater (CU 3), the following numbered and checked items are being inspected to ensure compliance.

<table>
<thead>
<tr>
<th>Item</th>
<th>Check</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Land Use Condition: Uses of treated/untreated groundwater?</td>
<td>☑ Yes</td>
<td>NAS TRB mill obtains its potable water from two new supply wells located east of Site 1. Vocs are removed by Base's water treatment facility.</td>
</tr>
<tr>
<td>If yes, is there evidence of use of untreated groundwater in violation of the remedy?</td>
<td>☑ Yes</td>
<td></td>
</tr>
<tr>
<td></td>
<td>☑ No</td>
<td></td>
</tr>
<tr>
<td>2. Any groundwater supply wells found?</td>
<td>☑ Yes</td>
<td></td>
</tr>
<tr>
<td>If yes, is there evidence of damage to the remedy?</td>
<td>☑ Yes</td>
<td></td>
</tr>
<tr>
<td></td>
<td>☑ No</td>
<td></td>
</tr>
<tr>
<td>3. Weather Conditions</td>
<td>86°F, Partly Cloudy</td>
<td></td>
</tr>
</tbody>
</table>

*a* If the answer to a question is 'yes', use the Comments column to list type(s) and name(s) of notices, permits, variances, or notices of intent found. Describes the type and location where the non-conforming groundwater use was observed or reported.