



Pennsylvania Department of Environmental Protection

Lee Park, Suite 6010
555 North Lane
Conshohocken, PA 19428
January 11, 2002

Southeast Regional Office

Mr. Winston Crow
Project Manager
Air National Guard/CEVR
3500 Fetchet Avenue
Andrews Air Force Base, MD 20762-5157

610-832-5940
Fax 610-832-6143



Re: ECP – Storage Tanks
111th Fighter Wing – Air National Guard
LRP ID No. 1-46-931-27535
Motor Pool Area
NASJRB Willow Grove
Horsham Township
Montgomery County

Dear Mr. Crow:

The Pennsylvania Department of Environmental Protection (“the Department”) has completed review of the Final Work Plan (“FWP”) submitted by Peer Consultants, P.C. (“Peer”) on behalf of the Air National Guard. The report was submitted on December 18, 2001. Before additional work is conducted, the Department recommends review of the applicable Chapter 245 and Chapter 250 regulations of the Pennsylvania Code. Recent modifications to both of these regulatory documents have been made that may pertain to the characterization and remediation of the subject site. In particular, the issues discussed in the paragraphs that follow may require additional consideration prior to commencement of the work proposed in the FWP.

If either of the (2) 6,000-gallon storage tanks formerly located on the property ever contained leaded gasoline, groundwater must be analyzed for dissolved lead. To distinguish between naturally occurring lead and anthropogenic lead, it is acceptable to analyze groundwater for tetraethyl lead, a known gasoline constituent. To characterize groundwater with respect to lead, a minimum of two independent rounds of sampling is recommended. If characterization sampling is required based on materials stored in the former tanks and lead is detected above the applicable remediation standard, additional sampling may be required.

Per a conversation with Ms. Debby Hines of Peer on January 10, 2002, it was determined that site groundwater has been analyzed for MTBE one time to date. The Department recommends that two independent sampling events be conducted to characterize site groundwater with respect to MTBE. If characterization sampling reveals the presence of MTBE in site groundwater above the applicable remediation standard, additional sampling may be required.



The Department's Storage Tank Program requires that Separate Phase Liquid ("SPL") impacting site media be removed to the maximum extent practicable. As a guide for determining when it is acceptable to terminate SPL removal efforts, the Department recommends EPA reference document 510-R-96-001.

Demonstration of attainment of a remediation standard as described in Chapter 250 is necessary for liability protection and site closure. It is possible to demonstrate attainment of the Statewide Health Standard ("SHS") even if SPL is present on site. In order to demonstrate attainment of the SHS, it must be shown that neither regulated substances at concentrations equal to or greater than their respective groundwater MSC nor SPL are present at or beyond the "point of compliance" as it is defined in Chapter 250. For your information, the point of compliance is defined as the "property boundary that existed at the time the contamination was discovered."

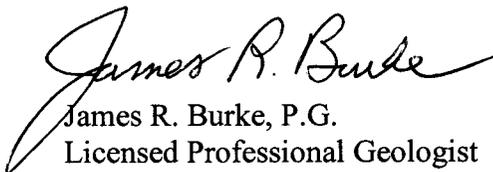
If you have any questions in regard to these matters, please contact me at 610-832-5940.

Sincerely,



M. Seth Pelepko
Geologic Trainee
Environmental Cleanup

Sincerely,



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

cc: Ms. Hines - Peer Consultants, P.C.
Mr. Burke
Mr. Day-Lewis
Mr. Pelepko
Re 30 (GJC02)11-13