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NOV 13 2002

Mr. Seth Pelepko
Waste Management/Environmental Cleanup Program
Pennsylvania Dept. of Environmental Protection
Southeast Regional Office
Lee Park, Suite 6010
555 North Lane
Conshohocken, PA 19428



REFERENCE: PEER TASK NO. 3152-001-001; GSA CONTRACT NO. GS-10F-0089K; GSA TASK NO. 9T1N050PG; GSA ORDER NO. T0901BH0630; GROUNDWATER MONITORING AT WILLOW GROVE AIR RESERVE STATION, WILLOW GROVE, PENNSYLVANIA

SUBJECT: RESPONSE TO COMMENTS ON THE DRAFT COMPLETION REPORT-REMOVAL ACTION (TASK 5A)

Dear Mr. Pelepko:

As requested by Mr. Winston Crow of the Air National Guard (ANG)/CEVR, attached are two (2) copies of the subject document. These have also been electronically transmitted to you.

If you have any questions or comments, please call Debby Hines or me at (865) 483-3191.

Sincerely,

Dean D. Nelson, P.E.
Chief Engineer

DH:clr

Attachment: Draft Response to Comments (2 copies)

cc: Winston Crow (ANG/CEVR) (w/o attachment)
Capt Jacqueline Siciliano (111th FW/CE) (w/o attachment)

**DRAFT
RESPONSE TO COMMENTS
FOR THE
DRAFT COMPLETION REPORT FOR
INTERIM REMOVAL ACTION OPERATIONS
AT THE MOTOR POOL AREA
WILLOW GROVE AIR RESERVE STATION
WILLOW GROVE, PENNSYLVANIA**

Reviewer: José Hurtado (ANG/CEVR)

1. **COMMENT:** Page 2-2, Figure 2: Please add a legend to identify/depict the buildings.

RESPONSE: A legend will be added to the figure.

2. **COMMENT:** Page 2-3, line 13: The groundwater monitoring report (PEER, June 2002) indicates that the groundwater flow trend is to the north. Table 2.2 of this report includes the groundwater elevations for the 05 May 02 activities; please use the latest measurements obtained to determine the groundwater flow.

RESPONSE: This paragraph will be revised to discuss the free product detected, and discussions of the potentiometric surface will be moved into the next paragraph. Due to the abnormalities observed in the potentiometric surface (as discussed in the next paragraphs on page 2-3), we decided to use these averages to determine the groundwater flow direction on Figure 2.1. However, we did not make it clear in the text that these averages were used. However, we will revise the text and only show the most recent groundwater elevations in Figure 2.2.

On Table 2.2, when free product was detected at 0.01 ft (measurements in MW-02 and MW-03 on 2/2/99, 6/2/99, and 9/28/99), it was reported as "Trace." However, the table should be revised to report these measurements as "0.01 ft," because there was a measurable thickness of 0.01 ft. When using the oil/water interface probe, the minimum reportable thickness is 0.01 ft. However, the probe can respond when there is free product present, but the thickness is below 0.01 ft. These observations are reported as "Trace." The table will also be revised to use "ND" for not detected, rather than "NA" for not applicable.

3. **COMMENT:** Page 2-4, Table 2.1: Please verify if MW-04 and MW-05 were sampled during the 8th Round.

RESPONSE: The results given (non-detects) were in error. The table should have indicated that these wells were "not sampled." The table will be revised.

4. **COMMENT:** Page 2-5, Table 2.2: Please format headings for Round 2 and 3.

RESPONSE: These headings will be revised to be consistent with other formats used.

5. **COMMENT:** Page 2-7, Figure 2.2: The values for the groundwater elevations for each of the wells do not appear on Table 2.2; please use the most recent readings taken at the site. Please see comment #1 [sic].

RESPONSE: See also comment/response to No. 2. The average groundwater elevations over the entire project were used to draw these contours. This was done to illustrate the generalized groundwater flow direction toward the northwest. However, it was not clear in the text that this was done, nor was there a table included that gave these averaged values. The figure will be revised based on last round of readings (May 2002).

6. **COMMENT:** Page 3-1, line 11: Was there any significant free product extracted.

RESPONSE: No visible free product was observed. We will add this statement in the text.

7. **COMMENT:** Page 3-2, line 12: It is indicated that previous results were taken into consideration to recommend the IDW disposal. Were the current results for the TCLP parameters considered for this recommendation? Please include the results of the TCLP analysis.

RESPONSE: This section will be revised to make it more clear what the status of IDW is. The last TCLP sample was collected after the baseline sampling, and the results were included in the "Final Letter Report, Seventh Round/Baseline Groundwater Monitoring," January 2002. During the last quarter of sampling (May 2002), the water was containerized in a 55-gal drum. Only two wells were sampled and the purge volume was less than 25 gal. The purge water from this next round will be placed in the same drum, and then a sample will be collected for TCLP analysis. We will revise this Completion Report to state that all previous analyses were "non-detect" for TCLP parameters of volatile and semivolatile organics, pesticides, and herbicides; any metals detected were magnitudes below applicable standards. Recommendations were made in each quarterly groundwater report that the IDW be disposed of in the sanitary sewer.

8. **COMMENT:** Page 3-2, line 15: Please indicate the procedure(s) used in disposing of the absorbent socks.

RESPONSE: The absorbent socks were placed in the "Oily Rags" receptacles at the Motor Pool. This will be added to the text. The ANG has a contract for disposal of the "Oily Rags."

9. **COMMENT:** Page 5-1, line 1: Please indicate/reference under what accordance has attainment been shown.

RESPONSE: A phrase will be added that this was "...in accordance with Subchapter G, "Demonstration for Attainment..."

10. **COMMENT:** Page 5-1, line 2: Has free phase product been measured or observed? Please clarify

RESPONSE: See also comment/response to No. 2. The text in Section 5.0 will be revised to say that free product has been measured at a thickness of 0.01 ft and at trace levels, i.e., detected by the oil/water interface probe, but at less than 0.01 ft.

11. **COMMENT:** Page 5-1, line 5: Please indicate for how long in monitoring going to continue and how many rounds are required or expected for closure. Please include any recommendations (i.e., closure).

RESPONSE: We will add that "One additional quarter of sampling is scheduled. However, PADEP has recommended two additional quarters of monitoring..." In addition, on page 4-2, a summary of the PADEP letter of August 1, 2002, will be added. A copy of the letter will also be included in Attachment A.

12. **COMMENT:** Page 6-1, line 14: Is this the Pennsylvania Code 25 referenced earlier in the report? If not, then include proper referenced document.

RESPONSE: The document referenced here is a guidance (technical) document, and not the specific Code. The Pennsylvania Code 25 was spelled out in Section 4.0; however, we will add it as a reference.