

Pennsylvania Department of Environmental Protection

Lee Park, Suite 6010
555 North Lane
Conshohocken, PA 19428
November 20, 2003

Southeast Regional Office

Phone: 610-832-5950
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Mr. David Praner
Project Manager
Air National Guard/CEVR
3500 Fetchet Avenue
Andrews Air Force Base, MD 20762-5157

Re: ECP – Land Recycling Program
111th Fighter Wing – Air National Guard
EFACTS No. 594691
Motor Pool Area
NASJRB Willow Grove
Horsham Township
Montgomery County

Dear Mr. Praner:

The Department of Environmental Protection (Department) has received and reviewed the October 2003 document titled "Final Completion Report for Interim Removal Action Operations at the Motor Pool Area," for the referenced area of concern. The report was prepared by PEER Consultants, P.C. and submitted to the Department in accordance with the technical requirements of the Land Recycling and Environmental Remediation Standards Act (Act 2). The NASJRB Willow Grove is designated a National Priorities List (NPL) property. Closure of individual sites that fall within the property boundary of the installation is available upon attainment of an Act 2 standard(s). Fulfillment of the administrative component of Act 2 is not required as part of this process.

The referenced area of concern formerly contained two 6,000-gallon underground storage tanks (USTs), one containing diesel fuel and one containing unleaded gasoline. A 1,000-gallon diesel fuel release occurred in 1990 during tank tightness testing activities. The diesel fuel UST was taken out of service following the incident and both USTs were subsequently removed in 1992.

Based on soil data collected at the referenced site between 1993 and 1997, the Department agrees that no additional investigation with respect to soil is necessary at this time.

With respect to groundwater, eight sampling events were completed at Monitoring Wells MW-02 and MW-03, which are located immediately downgradient of the former UST field, between September 1999 and July 2003. During this monitoring period, an exceedance of the non-residential used-aquifer medium-specific concentration (MSC) for naphthalene was noted at both MW-02 and MW-03 during the January 2001 sampling event. Concentrations in excess of the standard




were 580 micrograms per liter ($\mu\text{g/L}$) and 110 $\mu\text{g/L}$ at MW-02 and MW-03, respectively. Since the sampling event when the exceedances were observed, four additional sampling events have been completed at Monitoring Wells MW-02 and MW-03. No exceedances were noted during the four groundwater monitoring events completed after January 2001. Measurable thicknesses of free product have not been detected in any of the monitoring wells since September 1999. The Department believes that the data presented in the submitted report is consistent with attainment of the Statewide Health Standard in accordance with Section 250.707(b)(2)(ii). Although the "75/10X" criteria were met for both the MW-02 and MW-03 data sets, the sampling events were not conducted over the course of eight consecutive quarters and, therefore, it may be more relevant to compare the 95% Upper Confidence Limit (UCL) of the data sets' arithmetic mean to the applicable Act 2 standard. Assuming lognormal distributions, the 95% UCL of the arithmetic mean naphthalene concentration was lower than the non-residential used-aquifer MSC for both the MW-02 and MW-03 data sets. As such, the Department agrees that no additional investigation with respect to groundwater is necessary at this time.

Analytical parameters monitored over the eight groundwater sampling events completed between September 1999 and July 2003 for which the non-residential used-aquifer Statewide Health Standard was attained comprise the "shortlists" for diesel fuel and unleaded gasoline, with the exception of methyl tert-butyl ether (MTBE). These parameters include: fluorene, phenanthrene, toluene, ethyl benzene, xylenes (total), cumene, and naphthalene. MTBE was tested for during the final four sampling events completed between October 2001 and July 2003 and was not detected at levels above the method detection limit. Currently, there is no evidence suggesting that MTBE was ever released at the area of concern.

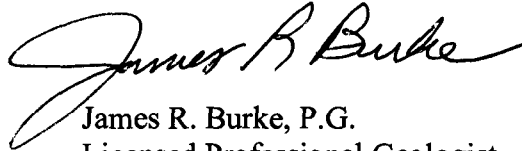
Any residual contamination remaining in either soil or groundwater at the site associated with the release addressed in the submitted report is believed to be protective of both non-residential and ecological receptors under the current and presumed future land use (i.e., active military installation).

Thank you for your cooperation in working with the Department in the remediation of this site. If you have any questions in regard to this matter, please contact me at 610-832-5940.

Sincerely,



M. Seth Pelepko
Geologic Specialist
Environmental Cleanup



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

cc: Mr. Nelson, - PEER Consultants, P.C.
Horsham Township
Montgomery County Health Department
Mr. Day-Lewis
Re 30 (AR03)324-9

**** IMPORTANT NOTICE ****

In January 2004, the Southeast Regional Office (SERO) will be relocating to Norristown. The new mailing address for the SERO will be as follows:

Department of Environmental Protection
Southeast Regional Office
2 East Main Street
Norristown, PA 19401

The new telephone numbers for the SERO will be as follows:

Main Telephone	484-250-5900
Air Quality	484-250-5920
Environmental Cleanup / Waste Management	484-250-5960
Regional Director's Office	484-250-5940
Radiation Protection	484-250-5950
Water Management	484-250-5970
Water Supply Management	484-250-5980