Brent, Thomas CIV NAVSURFWARCENDIV Crane, Code RP3-TB

From: Ramanauskas.Peter@epamail.epa.gov
Sent: Wednesday, November 19, 2003 11:42 AM
To: william.gates@navy.mil; Brent Thomas J CNIN
Cc: dgriffin@dem.state.in.us; Debus.Allen@epamail.epa.gov
Subject: MGBG CMS Addendum #1 Comments

Final Remedy Selection Fact Sh...

Gentlemen,

Here are EPA's comments on the MGBG CMS Addendum #1 QAPP dated November 2003. Please note that additional comments on rad topics may come from Larry Jensen.

Comment 1:

The Phase III RFI Report has not yet been approved. The text of the second paragraph on page 1-1 states otherwise.

Comment 2:

Referring to Figure 1-9, why isn't data/information from the newly installed well (01T05) included?

Comment 3:

Referring to test pitting/trenching mentioned Sections 1.5 and throughout Section 3.0, would continuing test trenching into the bedrock to look for potential stained/contaminated fractures be useful? Will you be checking for bedrock staining?

Comment 4:

Referring to Page 1-12: In the 3rd paragraph from the end of the page, it is mentioned that 4 other VOCs were previously analyzed using a method other than 8260B. If these 4 compounds are run using 8260B, the data will be relatively useless.

Comment 5:

Referring to Table 1-4: A new detection limit term appears here - 'minimum detectable activity,' (or 'MDA'). Is this intended to be synonymous with 'MDL.' If so, delete the confusing term - 'MDA.'

Comment 6:

Referring to the phrase "up to 10" in the first bullet on page 3-1, what decides how many trenches will be created?

Comment 7:

Referring to Sections 3.1, 3.4.1, and 3.5.1: The second bullet on page 3-1 seems to imply that there will be no soil sampling unless there is an elevated PID reading. Is this the case? Digging test pits may release VOCs from disturbed soil. It may be better to use the OVA to screen the

soil along the undisturbed surface of each newly excavated test pit and then sample with an EnCore directly from the test pit cavity as opposed to the piled up detritus. Also, because there is no way to compare detection concentrations detected by the OVA to contaminants concentrations in soil (in situ), but also because the detection limit of the OVA is far less sensitive than method 8260B would be, it may be advisable to collect at least one 'confirmation' sample from a test pit for lab analysis if all the pits turn out to be negative based on the field screen.

Comment 8:

Referring to the 4th paragraph on page 3-5, it may be useful to examine and/or sample the water seeping into the trench for presence of VOC or NAPL.

Comment 9:

The last paragraph of page 3-5 states that "up to six" soil samples are expected to be collected for VOC analysis? What if you see elevated PID at all 10 trenches? Also as stated in Comment 7, it may be advisable to collect at least one confirmation sample from the test pits.

Comment 10:

Referring to Section 3.4.1, dual references to 1,1,2,2 PCA should be changed to 1,1,2,2 TCA instead.

Comment 11:

Referring to the MNA well discussion on page 3-7, why not inlcude wells 1-25 (continuing to the northwest near the centerline of the plume) and 1-18 (south) for MNA parameter sampling?

Comment 12:

Referring to Section 3.5.1., some PID field data should be confirmed in the laboratory.

Comment 13:

Referring to Section 3.5.3, will any borehole logging/geophysics be done on the new wells (e.g., caliper, downhole video, etc.)?

Comment 14:

Referring to Section 3.5.4., to what depth will the proposed well boreholes be driven and how will screened intervals be determined (e.g., what if multiple water bearing fractures are encountered)? What type of testing will be done to identify water producing fractures (e.g., packer tests)?

Comment 14:

Referring to Section 3.5.7., groundwater should be 'stabilized' per U.S. EPA's 4/96 Groundwater Issue Paper, pp. 7-8. Three successive readings should be within plus or minus 0.1 pH units, plus or minus 3% for conductivity, plus or minus 10 millivolts for redox potential, and plus or minus 10% for turbidity and dissolved oxygen.

Comment 15:

Referring to Table 3-4, in the column for 'volatile fatty acids,' what is meant by the '#REF' notation?

Comment 16:

Referring to Table 3-9, under the 'acceptance limit' column, change the statement to read 'See Table 7-1.'

Comment 17:

Referring to Table 7-3, note that no surrogate data was listed here even though 'surrogate' appears in the title to this table.

Comment 18:

Referring to Section 8.0, is the Navy considering accelerated bioremediation as a potential remedy (perhaps this is what is meant by 'enhanced')? Also, referring to the third bullet on page 8-2, additional evaluation criteria include: state acceptance and community acceptance (see attached EPA Fact Sheet #3 - Final Remedy Selection for Results-Based RCRA Corrective Action - March 2000).

(See attached file: Final Remedy Selection Fact Sheet.pdf)

----Original Message ----
Sent: 11/19/03

This e-mail submitted the comments on the Draft QAPP Addendum #1 and the HASP for the Mustard Gas Burning Grounds.