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LETTER REPLYING TO U S NAVY LETTER DATED 6 JANUARY 2000 DISCUSSING
DISCHARGE OF AMMONIUM PERCHLORATE FROM GROUNDWATER AT SITE 1 ABL
ROCKET CENTER WV
2/28/2000
WEST VIRGINIA DIVISION OF ENVIRONMENTAL PROTECTION



Office of Environmental Remediation
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West Virginia Division of Environmental Protection

Cecil H. Underwood
Governor

Michael C. Castle
Director

28 February 2000

Mr. Steve Martin
Head
Installation Restoration Section
Atlantic Division
NAVFACENGCOM
Code 1823
1510 Gilbert Street
Norfolk, VA 23511-2699

**RE: Allegany Ballistics Laboratory (ABL)
Site 1 Groundwater Treatment Plant
Discharge**

Dear Mr. Martin:

This correspondence is in response to the Navy's 6 January 2000, letter regarding the discharge of ammonium perchlorate (AP) from the groundwater treatment plant at ABL.

As stated in the 17 November 1999, letter from the West Virginia Division of Environmental Protection (WVDEP), the compound is a pollutant as defined by §22-11 the West Virginia Water Pollution Control Act. The Office of Environmental Remediation (OER), acting in its role as the point of contact for this site, conferred with the Office of Water Resources/Industrial Branch (NPDES) and the Office of Waste Management/Environmental Enforcement to determine the adequate approach to address this discharge.

The following shall be implemented and included in the Site 1 long-term monitoring plan:

Monthly:

AP will be sampled and reported as part of the substantive industrial discharge requirements (influent and effluent), for the Site 1 groundwater treatment plant.

"To use all available resources to protect and restore West Virginia's
environment in concert with the needs of present and future generations."



West Virginia
Division of
Environmental Protection

Quarterly:

Establish a steady state effluent flow (a minimum one hour) from the groundwater treatment plant to the river. Delineate the zone of non-detect at the discharge point.

Sample and analyze the 34-groundwater extraction wells for AP and record the extraction rate for each well at the time of sampling. Within 60 days of this first quarterly sampling event for perchlorate, the Navy shall submit a brief report of the sampling results to WVDEP. Based upon this report, WVDEP will evaluate reducing the number of extraction wells to be sampled during the remaining three quarters.

Annually:

WVDEP will evaluate the prior year data and any new guidance/advisories, if necessary the monitoring program will be modified.

At anytime if information becomes available that identifies the discharge from the ABL groundwater treatment plant is a risk to human health and the environment, WVDEP will require prompt and appropriate action to ensure the risk is eliminated.

Future correspondence for this site should be submitted to Mr. Thomas Bass WVDEP's remedial project manager. However, if you have a need to discuss this or other issue(s) with WVDEP management, contact Mr. Donald Martin at (304) 924-6211.

If there are any questions or if you require further clarification on this letter, please contact me at (304) 558-2508 or Mr. Bass.

Sincerely,

Ken Ellison
Chief
Office of Environmental Remediation

cc: Bruce Beach, EPA
John Aubert, NAVSEA
Tom Bass, WVDEP/OER
Lou Williams, NAVSEA
Mike Egnor, WVDEP/OWR

Steve Hoffman, NAVSEA
David McBride, NAVSEA
John Fairbank, MDE
Dawn Hayes, LANTDIV