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LETTER AND CONCURRENCE FROM U S EPA REGION III REGARDING DRAFT INTERIM
REMEDIAL ACTION COMPLETION REPORT SITE 10 OPERABLE UNIT 5 (OU 5) ALLEGANY
BALLISTICS LABORATORY ROCKET CENTER WV

7/9/2012

U S EPA REGION III



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

July 9, 2012

Mr. Bill Fraser
NAVFAC Mid-Atlantic
Environmental Restoration OPHREV4
Building N-26, Room 3208
9742 Maryland Avenue
Norfolk, VA 23511-3095

RE: *Comments to Draft Interim Remedial Action Completion Report, Site 10, OU-5, Allegany Ballistics Laboratory, Rocket Center, West Virginia, February 2012*

Dear Mr. Fraser:

The U.S. Environmental Protection Agency (EPA) has finished its review of the above-referenced document. Comments to the document are attached. If you have any questions or concerns regarding our comments, please contact me by telephone at 215.814.3379 or electronically at kloss.sarah@epa.gov.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sarah Kloss".

Sarah Kloss
Remedial Project Manager
NPL / BRAC Federal Facilities Branch
MC: 3HS11

cc (electronic only): Thomas L. Bass (WVDEP)
Jamie Butler (CH2M HILL)
John Aubert (NAVSEA)
Lou Williams (NAVSEA)





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EPA Comments on the
Draft Interim Remedial Action Completion Report, Site 10, OU-5
Allegany Ballistics Laboratory, Rocket Center, West Virginia

Specific comments:

1. Section 2.0, Remedial Action Objectives, Page 2-1: This section should list the MCL cleanup goals.
2. Section 3.1, Selected Remedy, Page 3-1: The second paragraph states that LUCs have not been “formerly implemented at this time,” but they are “in place.” Explain the current mechanisms in place to ensure that these controls are working to prevent or minimize exposures.
3. Section 3.2, Groundwater Extraction and Treatment, Pages 3-1 to 3-2: This section states that the combined pumping rate for Sites 1 and 10 is 121 gallons per minute. Add a breakdown of how many gallons is extracted from each site.
4. Section 3.2, Groundwater Extraction and Treatment, Page 3-2: Specify the percentage of water treated at Plant #1 that is utilized by the ABL boiler plant versus the percentage that is being discharged to the North Branch of the Potomac River.
5. Section 3.3, Long-Term Monitoring, Page 3-2: The final paragraph on Page 3-2 states that Well 10EW36 was not sampled during the January reporting period because the well motor was out of service. The text should provide more follow-up information. How long was the extraction well inactive due to this out of service motor? What measures were taken to restore the motor and resume extraction?
6. Section 3.3, Long-Term Monitoring, Pages 3-3 and 3-4: Explain why there was no baseline sample for 10EW40. Also, provide an explanation for the sampling gap for 10EW40 during the 2006 event.
7. Section 4, Achievement of Remedial Action Objectives, Page 4-1: The second sentence states that the active phase of remedial action has been completed. Instead of “active phase,” “construction phase” would probably be more appropriate. The extraction system is still considered “active” remedial action.
8. Section 4, Achievement of Remedial Action Objectives, Page 4-1: This section should discuss hydraulic containment.

9. Section 5.1, Five Year Reviews, Page 5-1: The document should contain a “Conclusions” section. The second paragraph should be moved to the “Conclusions” section. Also, the discussions related to protectiveness should be omitted since protectiveness is a five year review determination, not an IRACR type determination. The conclusion section should summarize why the IRACR is ready for signature. For example, construction is complete for the extraction system.

Minor Comments:

1. Section 1.2, Page 1-1: In the fourth paragraph 1,1 – dichloroethene is misspelled.
2. Section 3.1, Page 3-1: The second sentence of paragraph two has an extra “b.”