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U S NAVY RESPONSES TO U S EPA COMMENTS ON DRAFT FINAL SITE 1 FORMER
DISPOSAL PITS 1 AND 3 ENGINEERING EVALAUTION AND COST ANALYSIS ALLEGANY
BALLISTICS LABORATORY ROCKET CENTER WV
3/14/2012
CH2M HILL

March 14, 2012

Ms. Sarah Kloss
Remedial Project Manager
NPL/BRAC Federal Facilities Branch
United States Environmental Protection Agency, Region 3
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Subject: Response to USEPA comments dated February 28, 2012 on the *Draft Final Site 1 – Former Disposal Pits 1 and 3 (Soil) Engineering Evaluation and Cost Analysis, Allegany Ballistics Laboratory, Mineral County, West Virginia, June 2011*

Dear Ms. Kloss:

On behalf of the U.S. Department of the Navy's Naval Facilities Engineering Command (NAVFAC), this letter is in response to USEPA comments received on February 28, 2012 regarding the subject document. Comments are presented in italics, followed by Navy responses.

General Comments:

1. *Response to General Comment 1: The response addresses the comment; however, EPA would like to note that groundwater investigations in the same area have noted the possible presence of DNAPL in the saturated zone (below the boundaries of the current excavation). Additional vertical excavation beyond the unsaturated zone may be beneficial. Given the difficulty of treating DNAPL, the benefit of this removal may outweigh the additional technical issues and costs. Alternatively, the Navy may want to consider adding amendments at the bottom of the excavation*

Response: This comment has been noted and will be taken under advisement during development of a work plan for site activities.

2. *Post-removal Characterization Sampling: The EE/CA proposes to limit the excavation at Pit 3 due to presence of the adjacent burning pad. However, this burning pad was not present during the time the Pit was in use. Thus, contamination may have migrated beyond the boundary of the stabilization wall (north of the wall). This area north of the wall where no excavation will occur should be sampled as part of the post-removal characterization sampling.*

Response: Agreed. Soil samples will be obtained from the areas adjacent to the engineered sidewall stabilization (details of which will be provided in the work plan) for consistency with the post removal characterization samples being collected from other removal areas. However, the RAO is to reduce contaminant

source mass. Therefore, it is possible that contaminant concentrations beyond the removal area, including beyond the engineered sidewall stabilization or the sloped portion of the excavations, may remain after achieving the RAO.

The following language is now included in the EE/CA for clarification during development of work planning documents, “Upon completion of the excavation activities, post removal samples will be collected for use during the final remedy selection. The post removal sampling details will be described in a work plan. It is assumed that discrete samples will be collected from each of the excavation sidewalls, including soils from adjacent to the engineered sidewall stabilization (possibly via hand auger, DPT, drilling, etc). Samples are not assumed for the floor of the excavation because the removal will be performed to groundwater.”

3. *Sidewall samples should be discrete so that the depth of residual contamination can be estimated. A composite sample will not give that level of information.*

Response: The text has been revised to indicate that discrete, rather than composite, samples will be collected. Please see the response to Comment 2 for specific language added to the text.

If you have any questions or comments regarding the above response to comments, please contact me at william.g.fraser@navy.mil or (757) 341-0478.

Sincerely,

William G. Fraser, P.E.
Remedial Project Manager
NAVFAC MIDLANT, Code OPHE3

cc:

Mr. Tom Bass/WVDEP