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WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION COMMENTS ON
DRAFT UNIFORM FEDERAL POLICY SAMPLING AND ANALYSIS PLAN SITE 1 OPERABLE
UNIT 4 (OU 4) PRE-CONFIRMATION SOIL SAMPLING ALLEGANY BALLISTICS
LABORATORY ROCKET CENTER WV
8/13/2013
WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION

WVDEP Comments

June 2003 Draft *UFP SAP Site 1 (OU-4) Pre-Confirmation Soil Sampling*

Comment 1: The title of the document, *Pre-Confirmation Soil Sampling*, and the references throughout the document should be changed (i.e., Pre-Remediation Sampling, Soil Characterization Sampling, Pre-Project Sampling, etc.) to reflect the proposed sampling is for defining the vertical and lateral boundaries of the target remediation areas. The use of confirmation sampling in the title and throughout the document can be interpreted to mean the final remedial goals have been met even before the remediation starts and before a final remedy is selected.

Comment 2: The statements, “*The Navy, in partnership with EPA and WVDEP, agrees that if soil removal is a component of the final remedy, and the dimensions of the target remediation areas have been defined before removal, sampling data will be used as post-removal confirmation data. Therefore, a subsequent post-confirmation sampling effort will not be warranted*”, on page 6, third paragraph, first and second sentences and page 45, first paragraph, last two sentences. These statements should not be in the SAP and should probably be deferred for another discussion or until a future phase of the remedial process.

Comment 3: Change Charlie Armstead to Catherine Guynn on page 3, Worksheet #1; page 19, Worksheet #3; page 23, Worksheet #5; and, page 29, Worksheet #7.