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DEPARTMENT OF THE NAVY
ATLANTIC DIVISION
NAVAL FACILITIES ENGINEERING COMMAND

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IN REPLY REFER TO:
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5090
1823:JJS:cag

JUL 15 1994

CH2MHill
Attn: Mr. Greg Mott
Project Manager
625 Herndon Parkway
Herndon, Virginia 22070-5416

Re: Draft Work Plan and Sampling and Analysis Plan for
Focused Remedial Investigation/Feasibility Study
for Site 1, ABL, WV

Dear Mr. Mott:

Enclosed are LANTDIV's comments on the Site 1 Work Plan and
Sampling and Analysis Plan in addition to U. S. EPA and
WV-DEP comments. As required for the final project plans,
please revise the project plans to address the enclosed
comments. The final deliverable should also provide a
separate written response to each comment.

If you have any questions or comments regarding the enclosed
comments, please do not hesitate to call me at (804) 322-4795.

Sincerely,



J.J. SZYKMAN
Remedial Project Manager
Installation Restoration
Section (South)
Environmental Programs Branch
Environmental Quality Division
By direction of the Commander

InterOffice Memo

To: Jim Szykman, RPM
Code 1823

From: Sherri R. Eng, Chemist *SRE*
Code 1832

Date: June 24, 1994

Subject: Draft Work Plan and Sampling and Analysis Plan for Allegany Ballistics Laboratory

I have reviewed the Draft Work Plans for Allegany Ballistics Laboratory submitted by CH2M Hill in May 1994. The following comments and concerns should be addressed prior to submission of Final Work Plans:

Draft QAPP

- Section 8, Analytical Procedures

Table 8-1 lists the analytical procedures that will be used on the samples collected during the field investigation. The table lists "ILM 03.0" as the methods that will be used for analysis of silver and cyanide. Please explain why SW-846 methods 7760 and 9010/20 are not being utilized.

- Figure 9-1, Flow of Forms and Sample and Analysis Information

The chart should include a data validation step since this step generates the majority of the paper work for the sampling activities that are occurring on the site.

- Section 10, Quality Control Checks

The word "duplicate" and "replicate" appear to be used synonymously. Replicates and duplicates are not the same according to NFESC and EPA. Please change all references to duplicates.

According to NFESC, NEESA policy 20.2-047B, is being changed to read that equipment blanks will be taken every day and analyzed every day. Change text and charts to match the new policy.

Draft Sampling and Analysis Plan

- Section 1, Sampling Program

If surface soils data is being used to support the risk assessment, shouldn't the sampling interval be 0 - 6 inches instead of 0-12 inches in order for the data to be more representative of true surface soil conditions?

Will surface water samples be filtered or totals? If this data will be compared to AWQC or used in the ecological risk assessment, both filtered and totals should be taken.

- Section 2, Sampling Operations

Please change text to read that a trip blank will be included in every cooler containing samples for volatile analysis, not just the cooler with ground water samples.

Draft Investigation Derived Waste Management Plan

- Is LANTDIV taking responsibility for IDW left at the site?

The ABL Facility Representative should not be responsible for ensuring that all containers are labeled. The contractor should leave all drums properly labeled.

In the text of this report, please detail what will be used for storage of the waste, whether drums, roll-offs or other containers.

Who is responsible for sampling the IDW that is containerized and what parameters will it be sampled for?

In the Container Storage Section, it states that drums will be stored at a specifically designated secure area, does this mean that drums will be moved from their original area of contamination?

CC: Byron Brant, Jay Newbaker

InterOffice Memo

To: Jim Szykman, Code 1822
From: Jay Newbaker, Code 1824 *J.N.*
Date: May 17, 1994
Subject: ABL Site 1 Work Plan and SAP

I have reviewed the *Draft Sampling and Analysis Plan and Draft Work Plan for the Focused Remedial Investigation/Feasibility Study for Site 1 at the Allegany Ballistics Laboratory Superfund Site* prepared by CH2M Hill, dated April, 1994. The following comments are only for the Draft SAP since the Work Plan contained mostly a summary of previous site data and an overlap of some of the information found in the SAP.

Section 1 - Sampling Program (p. 1-1)

1. The rationale for limiting analytical parameters at many of the sites should be explained in greater detail. For example, it is not clear why the surface water and sediment sampling will include only VOCs and surface soil sampling at the inert burn area will include only SVOCs. Justification for selection of analytical parameters should be provided for all the sites and media not undergoing full TCL/TAL

1.2 Groundwater Investigation (p. 1-3)

2. Additional information regarding the borehole geophysical surveys and packer testing should be provided in the SAP. The field procedures, make/model of equipment, an explanation of how the data will be used, and the sequence of drilling activities and geophysical surveys/packer testing should be explained. Borehole geophysical surveys are normally conducted after drilling an open borehole well. The geophysical data can then be interpreted and used in selecting intervals for packer testing.
3. Drilling methods and well construction procedures are not described in the SAP. The SAP should indicate whether ODEX/TUBEX drilling methods are still being considered and the procedures and materials to be used in constructing the monitoring wells. Well development methods should also be described.
4. It is not clear why only one round of water level measurements is planned for the monitoring wells. One or two additional rounds of groundwater elevation measurements should be considered. Stream gauging data should also be obtained when taking groundwater level measurements to assess groundwater/surface water relationships. A stream staff gauge can be installed if no stream gauging information is available.

1.4 DNAPL Investigation (p. 1-6)

5. Procedures for the seismic refraction survey and the use of the water soluble dye should be included in the SAP. It is not clear if the water soluble dye is used with groundwater samples, soil samples, or both.

2.3 Collecting Soil Samples (p. 2-5)

6. Although hydraulic probing equipment is an acceptable soil sampling method, sample volumes can be limited and no explanation of equipment or procedures is included in the SAP. It is not clear why this method was chosen over the more widely accepted split spoon/hollow stem auger method of sampling.

2.4 Soil Gas Sampling (p. 2-5)

7. The SAP should include the equipment and methods to be used for the soil gas survey.

cc: Byron Brant

Sherri Eng