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**DIVISION OF ENVIRONMENTAL PROTECTION**

GASTON CAPERTON  
GOVERNOR

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Charleston, WV 25301-1401

LAIDELY ELI McCOY Ph.D.  
DIRECTOR

December 4, 1995

Mr. Jeff Kidwell  
Atlantic Division  
NAVFACENGCOM  
Code 1823  
1510 Gilbert Street  
Norfolk, Virginia 23511-2699

Re: WV-DEP requirements for purge/development water derived during well installation at sites 1 and site 10

Dear Mr. Kidwell:

As discussed in the teleconference of November 21, 1995 the State will allow purge and development water associated with the wells to be installed in the site 1(burning grounds area) to be disposed of by discharging to the ground surface in the vicinity of the wells from which the water is to be extracted. Care shall be taken such that no run-off to surface water is possible. If elevated contaminant levels are anticipated in the purge/development water, another allowable option would be to dispose of the water in the vicinity of the former disposal pits. This latter option is applicable only to wells in the site 1-burning grounds area.

With regard to Site 10, the analytical data provided by CH2MHILL indicates the potential to exceed the RCRA TCLP limit of 500 ug/l TCE at the following locations (see attached map):

- The proposed well location adjacent to sample point 1.
- The three proposed well locations to the west of sample point 2.

Therefore purge/development water from the above wells shall be containerized.

The containerized water may be analyzed to determine appropriate disposal options, or assumed to be contaminated, and treated in the waste stream generated by the proposed aquifer pumping tests.

The above requirements are based upon the interpretation of the EPA Guidance Document Guide to Management of Investigation-Derived Wastes (OWSER Pub. 9345.3-03FS, January 1992) which states that IDW be managed with an option that "...(1) is protective of human health and the environment and (2) complies with (or waives) ARARs.... The State considers RCRA to be an ARAR in this situation should ground water exceed the promulgated TCLP limits.

Future investigative effort in the site 1-burning grounds area may involve IDW ground water likely to exceed the TCLP limits. In accordance with the above referenced guidance, the State will consider the waiver process on an action specific basis for this area.

If there are any questions, or if you require further clarification, please contact me at (304) 558-2745.

Sincerely,



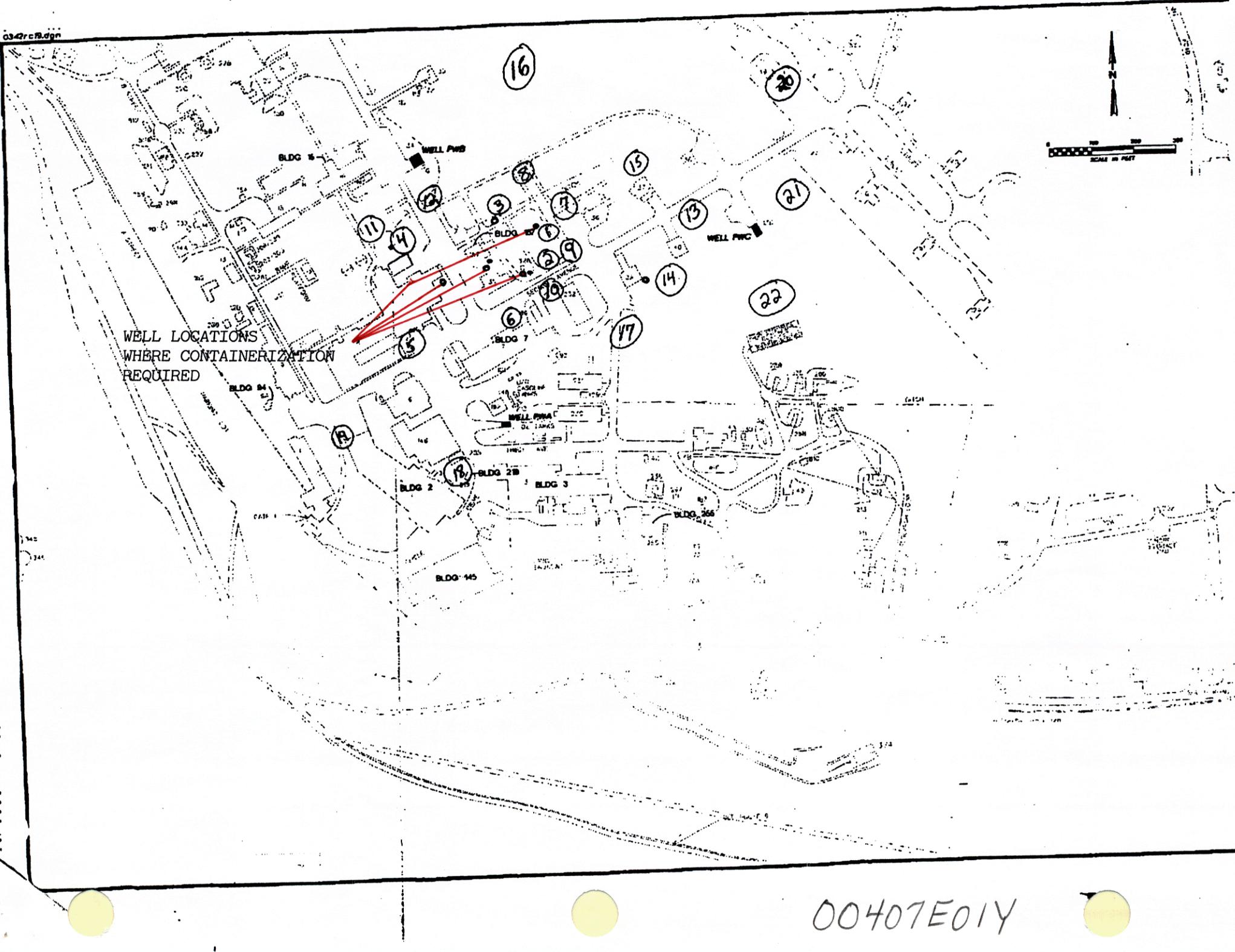
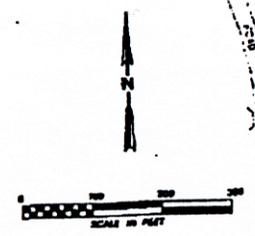
Thomas L. Bass  
Environmental Resource Specialist II  
Office of Waste Management  
Site Investigation and Response

TLB/MS/o

cc: Bruce Beach, EPA  
Wendy Noe, MDE  
David McBride, ABL

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WELL LOCATIONS  
WHERE CONTAINERIZATION  
REQUIRED



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