

3.01 11/18/97 610

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
841 Chestnut Building  
Philadelphia, Pennsylvania 19107

November 18, 1997

Commander, Atlantic Division  
Naval Facilities Engineering Command  
Environmental Quality Division  
Code: 1823  
Norfolk, Virginia 23511-6287  
Attn.: Chris Penny

SUBJECT: Site 1 Work Plan Submittal  
Allegany Ballistics Laboratory, Rocket Center, West Virginia

Dear Chris:

The EPA has reviewed the Work Plan Groundwater Remediation, Site 1 Northern Riverside Waste Disposal Area at the Allegany Ballistics Laboratory (ABL), Rocket Center, West Virginia. The document was prepared for the Navy by OHM Remediation Services Corp. The Plan is presented in a clear and logical manner and the following comments are for clarification.

Review comments presented in this letter cover the Phase II Work, Phase I was reviewed and commented on in a letter dated 15 September 1997.

#### GENERAL COMMENTS

1. In the Introduction Section, perhaps Subsection 1.4.2, please discuss the differences between the operation and maintenance (O&M) plans and any monitoring plans, especially as performing compliance monitoring is one of the operation and maintenance objectives.
2. Please discuss the 3-month O&M period, is it contractual and can it be extended to say one year.
3. Additional sampling of the individual extraction wells should be planned. The Plan indicates only Pre- and Post-Treatment Sampling.
4. It may be more efficient for later soil cleanup evaluations to collect soil samples during trench excavation.

5. Potential human health risks should be evaluated during treatment plant operation as part of the Health and Safety requirements. A monitoring program should be included, at least for start-up operations to measure VOCs in the plant and at specific components of the treatment process. These operations might include the UV-oxidation unit, the air stripper, the drain down step prior to filter press backwash, the draining of decant from the sludge decant tank to the floor drains, operation of the plate and filter press, the filtrate discharge to the floor drains, the filter cake transfer, and the carbon changeouts.
6. Appendix D, Exhibit 3.4, Submittal Register: There are several specification sections that currently do not indicate Government (US Navy) approval, that should. The Navy should insure that the appropriate items are submitted for their approval.

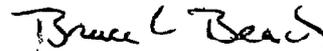
#### SPECIFIC COMMENTS

1. Introduction, Section 1-4, pg. 1-6: Please include a copy of the Monthly Progress Report to the EPA and WVDEP.
2. Introduction, Section 1.6, pg. 1-7: Please indicate that the Contractor Quality Control Plan is included in this Plan as Appendix D Quality Control Plan.
3. Description of Activities, Section 3.1.7, pg. 3-4: Air monitoring, either for HASP or for compliance monitoring, is not discussed in Section 4 of the Plan.
4. Description of Activities, Section 3.3.3.2, pg. 3-13: Please add a bullet to indicate monitoring for potential human health risks.
5. Description of Activities, Section 3.3.3.3, pg. 3-13: Please indicate how often samples will be taken, reference the Field Sampling Plan, Table 2.2.
6. Description of Activities, Section 3.4, pg. 3-14: Please add a sentence to reaffirm that on-site work involves excavation/construction in potentially contaminated areas.
7. Decontamination Procedures, Section 4.1, pg. 4-1: Please add a bullet for trenching and pipe laying during on-site work.
8. Appendix B, Introduction, Section 1.1, pg. 1-1: Please drop the first sentence in the last paragraph.
9. Field Sampling Plan, Section 2.1 and Table 2.2, pg. 2-1: Surface water and sediment samples will need to be taken in the North Branch Potomac River. These samples will be used to evaluate the mixing potential of the river for the treated discharge and the self cleaning of the river after groundwater discharge at Area 1 is contained; VOC and metals analyses will be required.

10. Field Sampling Plan, Section 5.2.4, pg. 5-2: Due to potential cross contamination problems (false positives) encountered using acetone, suggest using another organic rinse (pesticide grade isopropyl alcohol).
11. Field Sampling Plan, Section 8.1, pg 8-1: Please identify the laboratory and this selected lab must also be CLP certified.
12. Field Sampling Plan, subAppendix A: Please provide the missing Appendix A from this .

If you have any questions concerning any of these comments, please call me (215) 566-3364.

Sincerely,



Bruce W. Beach  
Remedial Project Manager

cc: Tom Bass, WV DEP  
Wendy Noe, MDE  
Dawn Boucher, LANTDIV  
Greg Mott, CH2M Hill  
Lou Williams, NAVSEA  
Steve Hoffman, NAVSEA  
David McBride, Alliant Techsystems, Inc.