11/17/03-01626

Division of Water & Waste Management
1356 Hansford Street
Charleston, WV 25301-1401
Telephone Number: (304) 558-5393
Fax Number: (304) 558-0256

West Virginia Department of Environmental

Bob Wise
Governor

Stephanie R. Timmermeyer
Cabinet Secretary

November 17, 2003

NOV 17 2003
OFFICE OF
ENVIRONMENTAL REMEDIATION

Mr. John Waugaman
Alliant Techsystems
Allegany Ballistics Laboratory
Mail Stop WV01-26P
210 State Route 956
Rocket Center, WV 26726-3548

RE: Risk Assessment for Human Exposure at the Burning Grounds

Dear Mr. Waugaman:

This letter is concerning several issues with the Human Health Risk Assessment completed for the facility Burning Grounds and submitted in Allegany Ballistics Laboratory's (ABL) Part B Permit Application. During discussions with Tom Bass concerning the CERCLA activities on-going at the facilities, it was determined that a substantial amount of available data was not included in the risk assessment model. The 11-acre CERCLA Site 1 encompasses the active 8.5-acre RCRA Interim status Burning Ground. Numerous field events to collect environmental data have transpired from 1992 through 2001. The field events collected and analyzed many surface and sub-surface soil samples within the Burning Ground that were not included in the human health risk assessment. The second issue pertains to the referenced IRP background identification within the document. The WVDEP/DWWM understands a valid background has not been established at ABL. On 25 April 2003, a Draft Technical Memorandum for a background soil investigation was submitted to WVDEP/DRL under the CERCLA program for review and comment. At this writing, the document has not been accepted by either the USEPA or WVDEP.

The human health risk assessment will be re-evaluated for the Burning Ground using all available and relevant environmental data whether derived under RCRA or CERCLA. The risk analysis for the Burning Ground should assess the potential risk of the 8.5 acre active Burning Ground, a secondary risk assessment for "hot spots" areas of contamination that would be of concern to workers in the area.

Please submit the revised Human Health Risk Assessment and include the raw data summary sheets utilized in the HHRA with a map of the sample locations and the new comparison to background by December 15, 2003 or show justification why this should not be done.

If you have any questions, call Mark Priddy at (304) 558-5393.

Sincerely,

R. Michael Borsch
Assistant Director

cc: Tom Bass
Mark Priddy
James Duranti
John Hando