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west virginia department of environmental protection

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Division Of Land Restoration  
Office of Environmental Remediation  
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Charleston, WV 25304-2345

Joe Manchin III, Governor  
Stephanie R. Timmermeyer, Cabinet Secretary  
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1 May 2007

Naval Facilities Engineering Command, Atlantic  
Steven Martin  
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NAVFAC Mid-Atlantic, Code EV3  
9742 Maryland Avenue  
Bldg N-26, Room 3208  
Norfolk, VA 23511-3095

Re: *Draft Engineering Evaluation/Cost Analysis For Site 1 Western Drainage Ditch*

Dear Mr. Martin:

The West Virginia Department of Environmental Protection/Division of Land Restoration (WVDEP/DLR) has completed the review of the: *Draft Engineering Evaluation/Cost Analysis For Site 1 Western Drainage Ditch*, Allegany Ballistics Laboratory, Rocket Center, West Virginia dated February 2007 and has the following comments.

The document as written does not adequately address the substantive requirements to mitigate the impacted area. The disposal area is an open dump by definition of §33CSR1. The intent of Section 7.1.c of §33CSR1 is clear; “no landowner may allow an open dump to exist on his or her property unless such open dump is under a compliance schedule approved by the Secretary.” Further, §47CSR2 identifies conditions not allowable in the waters of the State, specifically “deposits or sludge banks on the bottom; material in concentrations which are harmful, hazardous or toxic to man, animal or aquatic life; any other condition, including radiological exposure, which adversely alters the integrity of the waters of the State including wetlands; no significant adverse impact to the chemical, physical, hydrologic, or biological components of aquatic ecosystems shall be allowed.”

It is WVDEP’s conclusion that the proposed action although limited in nature fails to meet the removal action objectives established in the document. The objectives are to prevent the transport of contaminated soil to surface water and comply with State ARARs. In addition, the document states it is anticipated that once this action is complete that it will serve as the final action. The action as proposed fails to meet the regulatory requirement and will not serve as a

final action. The document also fails to address the impracticability of a cap in an area that is prone to damage through flood events as well as the potential ineffectiveness of a cap in an area that floods frequently.

Therefore, WVDEP cannot concur with the proposed action.

1. Page III; Executive Summary: The discussion should identify that the debris and waste located in the area is from waste disposal operations. Please modify the discussion.
2. Page III; Site Description: The Site description does not adequately describe the relationship between the two plants or disposal activities at Site 1. Site 1 consists of numerous component disposal sites. These component sites were described in the Initial Site Assessment, Interim Remedial Investigation, as well as other investigative reports and work plans. These components include the former hazardous waste drum storage area (SWMU 1), ash and unburned residue from incineration (SWMU 22c, SWMU 22d), and Inert burning (SWMU 11).
3. Page III; Site Description: Please define the statement “the ditch is an enhanced earthen opening...”. The appearance is a ditch through waste disposal. Please clarify.
4. Page III; Site Description: Please restate the ditch purpose. There are multiple surface water conveyance systems throughout plant 1, the western ditch is part of a larger system. Please correct the discussion.
5. Page III; Site Description: The last sentence states that the removal is in the vicinity of the western ditch. Actually the western ditch is the subject of the removal action. Please clarify.
6. Page III; Removal Action Objectives: The discussion begins with “based on the characteristics of the western ditch...” Please identify the means of characterization.
7. Page IV; Removal Action Alternatives: Please add an additional alternative (alternative 3) identifying the total removal of the waste.
8. Page 1-1; Introduction; first paragraph: The intent of the EE/CA should be to mitigate the source area associated with the disposal of waste at the western drainage ditch located at Site 1.
9. Page 2-3; Site History; third paragraph: Please clarify the statement “the ditch is an enhanced earthen opening...”. The ditch is a trough cut through waste disposed of at that location.

10. Page 2-5; Human Health Risk Assessment Summary: Please provide a residential risk or a rationale for excluding the evaluation.

If there are any questions or a need for further clarification, please contact me a (304) 926-0499 extension 1274 or by email at [tbass@wvdep.org](mailto:tbass@wvdep.org).

Sincerely,

Thomas L. Bass  
Environmental Resource Specialist  
Office of Environmental Remediation  
Superfund Group

cc: Donald Martin – WVDEP      John Aubert - NAVSEA  
Joshua Barber – USEPA      Steve Glennie – CH2MHill  
Lou Williams – NAVSEA