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west virginia department of environmental protection

Division Of Land Restoration
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28 January 2009

Naval Facilities Engineering Command, Atlantic
Michael P. Helbling
NAVFAC MIDLANT
HR IPT Environmental Restoration Section
Remedial Project Manager for ABL
NAVFAC Mid-Atlantic, Code EV4
9742 Maryland Avenue
Bldg N-26, Room 3208
Norfolk, VA 23511-3095

Re: Response to Navy Response to WVDEP Comments Long-Term Monitoring Optimization Strategy, Site 1, 5, and 10, Allegany Ballistics Laboratory, Rocket Center, West Virginia, CH2M Hill, October 31, 2008

Dear Mr. Helbling:

The West Virginia Department of Environmental Protection/ Division of Land Restoration (WVDEP/DLR) has completed the evaluation of *Navy Response to WVDEP Comments Long-Term Monitoring Optimization Strategy, Site 1, 5, and 10, Allegany Ballistics Laboratory, Rocket Center, West Virginia, CH2M Hill, October 31, 2008* and provides the following response:

1. Response to WVDEP comment 2: The response states "The purpose of the technical memorandum is to develop a strategy to optimize the ABL Site 1, 5, and 10 LTM, and increase efficiencies in sampling and analytical requirements." The Navy will need to explain how elimination of quality control addresses optimization or increases efficiencies.

Environmental data submitted to WVDEP for assessment must comply with the requirements of W.V. Code §22-1-15 and Legislative Rule 47-32. The West Virginia regulation establishes quality control requirements for the collection of environmental samples. Therefore, WVDEP cannot concur with eliminating quality controls.

2. Response to WVDEP comment 3: In response to the request for an explanation, WVDEP cannot eliminate/restrict monitoring for the following reasons:
- i) The monitoring at Site 1 serves a dual purpose RCRA compliance monitor and monitoring of the CERCLA remedial action. The active RCRA permit identifies volatile organic compounds (VOCs) that may be associated with the RCRA unit and will require assessment.
 - ii) Site 5 is the location of historic waste disposal including buried drums that contained solvents as well as other waste that are being managed in-place. There are uncertainties associated with historic disposal and disposal practices for this reason evaluation for potential releases of solvent compounds to the environment will be required.
 - iii) There are unanswered questions associated with solid waste management units (SWMUs) hydraulically upgradient of the Site 10 groundwater collection system, and there have been numerous volatile organic compound releases associated with the units identified during the limited SWMU investigations. The site 10 groundwater collection system may be an interception point for these releases. Until such time that all actions are in place to address potential groundwater contamination within the area, WVDEP cannot concur with reducing the analytical parameters.
3. Response to WVDEP comment 4: The first paragraph of the Navy response does not address the discovery of the new sources and provides an unverified assumption. The *April 1997 Record of Decision Site 1 Operable Unit 3, Groundwater, Surface Water, and Sediment at the Allegany Ballistics Laboratory, West Virginia* identified the known sources of VOC contamination. "Three former solvent disposal pits are located in the southwestern portion of the fenced area. These pits are considered the prime source of the ground water solvent contamination at Site 1. Two additional areas, identified as potential spill sites are possible sources for solvent contamination. These two areas are located in the northeastern portion and the northwestern portion of the fenced area." It should be noted that the recent discovery of significant concentrations of solvents at a depth of ten feet, was outside of the fenced area in the northwestern area of Site 1 boundary.

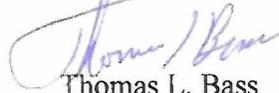
Regarding the second part of the response to WVDEP's comment 4, WVDEP acknowledges that properly placed monitoring well(s) within the area of solvent impacted soil may provide information, but they may not answer the question whether contaminated groundwater is migrating to the North Branch Potomac River.

WVDEP requested an evaluation of the potential ground water - surface water interface utilizing temperature probes, a valid scientific approach; however the Navy rejected this approach and stated that they will only install monitoring wells. To be clear, I disagree that the monitoring well approach was agreed upon by WVDEP.

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Response to the Response to
LTM Sites 1, 5, 10.
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If you need clarification I can be reached at Thomas.L.Bass@wv.gov or (304) 926-0499 extension 1274.

Sincerely,



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Office of Environmental Remediation
Superfund Group

cc: Don Martin – WVDEP
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