



03.01-11/13/95-00401

DIVISION OF ENVIRONMENTAL PROTECTION

GASTON CAPERTON
GOVERNOR

1356 Hansford Street
Charleston, WV 25301-1401

LAIDELY ELI McCOY Ph.D.
DIRECTOR

November 13, 1995

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

Re: Comments to the Phase II Remedial Investigation (RI) at Sites 2, 3, 4B, 5, and 10, Allegany Ballistics Laboratory, Rocket Center, West Virginia.

Dear Mr. Kidwell:

The Office of Waste Management/ Site Investigation and Response has reviewed the Phase II RI for Sites 2, 3, 4B, 5, and 10 at the Allegany Ballistics Laboratory (ABL), Rocket Center, West Virginia and has provided the following comments.

General Comments

1. Various isolated Areas within the facility contain high levels of contamination (hot spots). The phase II RI does not address the Navy's intent and/ or position for addressing these areas. To avoid potential future health and safety problems with possible construction in these areas as well as the RCRA listed waste issues in the event the soil is disturbed. It is OWM/ SIR's belief it would be in the best interest of the facility to remove and/or remediate hot spots within areas of the facility during the Site 1 soil cleanup activities.
2. It is OWM/ SIR's understanding through pervious discussions Sites 5 and 10 (PWA) will receive additional monitoring wells as well as aquifer testing during the Pre-Design phase for Site 1. The State's acceptance of the Phase II RI would depend upon completion of the additional agreed upon work.
3. The Ecological Risk Assessment for the Phase II RI appears superficial. Furthermore, OWM/ SIR concurs with the EPA's comments to the Ecological Risk Assessment submitted October 18, 1995.

Specific Comments

1. On page ES-1 provide a brief description on Alliant Techsystems Inc. acquisition.
2. In the section site Background the concentration units should be reported in micrograms per kilogram.
3. Provide a justification for excluding the contaminants acetone and methylene chloride from figure 6-1.
4. On page 6-3 the two unusual TCE detections could conceivably be a new source area. The Navy should attempt to determine if there is an impact to groundwater in this area from a possible new source.

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
Site Investigation and Response
Office of Waste Management

TLB/MS/o

cc: Bruce Beach, EPA
Wendy Noe, MDE
David McBride, ABL
Greg Mott, CH2M Hill