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DIVISION OF ENVIRONMENTAL PROTECTION

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October 27, 1997

Dawn Hayes (Boucher) -- Code 18234
Remedial Project Manager
LANTDIV -- LANTNAVFACENGCON
1510 Gilbert Street
Norfolk, VA 23511-2699

*11/4/97
Tom will
resend / revise
comments*

RE: **Allegany Ballistics Laboratory
Site 5 - Inert Landfill
Comments to "Draft Long Term Monitoring Plan"**

Dear Ms Hayes:

Due to workload constraints brought about by the need to review the Environmental Baseline Study draft report, Tom Bass was unable to review and comment upon the subject document. The review and following comments have, however, been discussed with Mr. Bass, and he is in agreement with them. Should you have any questions please do not hesitate to contact either him or me.

GENERAL COMMENTS

*respond that located
this is in other
documents*

1. Under the "Introduction: Summary of Existing Groundwater and Sediment Data" section, a description of the lithology, strike and dip of the bedrock should be included.
2. All storm water monitoring shall conform to the NPDES requirements submitted with these comments.

SPECIFIC COMMENTS

- **Page 1-7:** For tables 1-1 and 1-2 (page 1-8) chloroethane is shown as not detected but estimated (UJ) for wells 5GW7 and 5GW11. This compound should also be included on the maps (figures 1-3 and 1-4) to alert reviewers to the possibility of the presence of this compound.

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- Page 1-13: 5GW6 has a large number of estimated values. Some discussion of these results are in order since the well will be used in the monitoring program.
- Page 1-20: The second paragraph in the "Sediment" section refers to Tables 1-5 and 1-6. These tables are for "surface water samples" (I assume from the river) and not for the sediment samples. They should be included to meet the requirements of §47 CSR 38.3.8.4.f.E, but the tables for the sediment analysis should also be included.
- Page 2-2: Table 2-1. The latitude and longitude should be provided for these monitoring wells in accordance with §47 CSR 38.3.8.4.b. The State believes this to be a substantive requirement so these wells can be placed on the state's groundwater database currently under development.
- Page 2-2: Groundwater Sampling Frequency. Quarterly sampling may only be required for the first year. Annually the analytical results from previous monitoring may be evaluated and with Navy, State and EPA concurrence the sampling frequency may be decreased.
- Page 2-4: Table 2-2. Should also include a note that samples will also be tested for TAL Metals and Cyanide to conform with the text on page 2-2 under "Groundwater Analytical Parameters".

Several compounds required in 47 CSR 38 Appendix I are omitted from the analyte list.
- Page 3-4: Data Interpretation. Last paragraph, first sentence should read "at least one sample", not "at least on sample"

Evaluation of Storm water Data: What occurs if the Storm water analysis exceeds the discharge limits?
- Page 4-1: Reporting and Notification. All analytical sampling reports (quarterly, semi-annual, annual, etc.) shall be submitted to the Office of Water Resources, 1201 Greenbrier St., Charleston, WV 25311-1088, attn: M. Shafiei and copied to Office of Waste Management/Site Investigation and Response, attn: Tom Bass, within 45 days of validation.

In the event of a statistical increase in the parameters, the operator must notify WVDEP in 14 days (§47 CSR 38. 4.11.2.d.A), and within 30 days, repeat the sampling (§47 CSR 38. 4.11.2.d.B). If repeat sampling confirms the increased contaminant levels, a Phase II assessment must be performed (§47 CSR 38.11.2.d.D).
- Appendix B, Page 5: Sampling Operations. Third paragraph on page. The statement "The rest of the sample jars will be filled by pouring from the bucket...." must be made to conform to the statement on page 3-1, paragraph three.
- Appendix C, Page 2-3: Project Schedule. Identify the referenced work plan.

- **Appendix C, Page 15-1: Quality Assurance Reports.** The State wishes to be copied on these reports. Is field activity defined as being completed at the end of each quarter, four quarters, or does this refer to the entire length of the long term monitoring.
- **Appendix D, Page 3: Section 2.2, fourth paragraph** must conform to the language on page 3-1, Paragraph 3 regarding sampling from the 5 gallon bucket. See comment made for Appendix B, Page 5 above.

Last paragraph is unclear. Is sediment sample to be taken from the shore, or from the stream bed? Since this is a HASP, knowing this will determine what type of equipment is required.

- **Appendix D, Page 26: Section 7.1, Decontamination Specifications: Water-disposal method.** Though the State has permitted this activity during Remedial Investigations, etc., it has done so with the understanding that the site would be cleaned up during some form of remedial action. However, this does not apply in this situation as this is intended to be a long term remedy with no additional action anticipated at this time. Further, the monitoring wells are mostly outside the boundary of the cap, and disposing of decontamination water in this manner may cause soil contamination that is otherwise not present. Therefore, the decontamination water must be containerized and treated accordingly. This statement must be changed to conform to Appendix E, Page 2, Labeling, paragraph 1.
- **Appendix E, Page 3: Table 1. Purge water** must be containerized and characterized before disposal. To do otherwise would potentially result in the release of hazardous substances into an uncontaminated area (see comment for Appendix D, Page 26).

Appendix E, Page 4: Minimizing IDW. The comment for Appendix E, page 3, Table 1 (above) applies. Purge water must be containerized and characterized before disposal.

Sincerely,

Michael I. Stratton
ERPM-I