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(757) 322-4795

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20 AUG 1996

U.S. Environmental Protection Agency
Region III
Attn: Mr. Beach
841 Chestnut Building
Philadelphia, Pennsylvania 19107

Re: Draft Final Workplan, Soil Segregation And Analysis, Allegany Ballistics Laboratory, West Virginia

Dear Mr. Beach:

Enclosed are the Department of Navy's responses to comments received on the subject document. The responses, developed from our numerous discussions and conference calls, reflect the changes you can expect in the final document which will be provided to you directly from Mr. Gordon Miller of OHM Remediation Services, Corp. You can expect to receive the final document by August 16, 1996.

Please review these responses and provide either your written exception or concurrence within fourteen (14) days.

I appreciate the effort you have made and the assistance you have provided in completing this element for this site. Should you have any questions or would like to further discuss this or any other matter, please do not hesitate to contact me at (757) 322-4795.

Sincerely,

L. G. SAKSVIG
Head
Installation Restoration Section
(South)
Environmental Programs Branch
Environmental Quality Division
By direction of the Commander

Re: Draft Final Workplan, Soil Segregation And Analysis, Allegany Ballistics Laboratory, West Virginia

Copy to:
MDE (Ms. True Noe)
Allegany Ballistics Laboratory (Mr. Hulburt)
COMNAVSEASYSCOM (Code 0923, Mr. Hoffman)
COMNAVSEASYSCOM TECHREP (Mr. Williams)
OHM (Mr. Miller)
ROICC Yorktown (Mr. R. Matthews)

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RESPONSES TO COMMENTS ON THE DRAFT FINAL WORKPLAN, SOIL SEGREGATION AND ANALYSIS, ALLEGANY BALLISTICS LABORATORY

Responses to comments from West Virginia Department of Environmental Protection, dated June 14, 1996

1. *(6.1.2.1 Layout Control Documentation) The Navy may want to consider using the State Plane and Coordinate system to survey in the disposal area at Site 5.*

   OHM will revise the text to indicate that the State Plane and Coordinate System will be utilized to document the disposal location.

2. *(6.1.4 Site Restoration) Reword the reference "...to the cap Area." The referenced excavated material should be used to regrade the area. Any cap installation would require and appropriate design capable of meeting regulatory requirements.*

   OHM acknowledges this comment and will revise the text accordingly.

3. *(2.5.2 Mercury Compounds) Keep the document consistent: provide and explanation of how the discarded Mercury is going to be disposed of and the RCRA waste stream identification number.*

   Appendix A, Part 2.5.2 will be modified to indicate that Mercury vials will be labpacked and disposed of as U151 waste.

4. *(5.2.4 Level B) The justification for downgrading to level C is inappropriate, unless the Navy can provide real time monitoring for Beryllium to ensure adequate worker protection consistent with NIOSH recommendations.*

   Because of beryllium's high toxicity and low exposure limit, OHM concurs with this comment. The reference to downgrading to Level C will be removed.

5. *(Table 8.1) USEPA region III's telephone numbers have changed. Furthermore Mr. Szykman left LANTDIV approximately one year ago. The table does not reflect these changes.*

   The tables will be revised accordingly.

6. *Does the Navy intend to contact the West Virginia Division of Environmental Protection in the event of a spill or an emergency? See #8 below.*

   OHM will immediately notify the Navy and ABL's David McBride in the event of a spill or emergency. The Navy will be primarily responsible for contacting the WVDEP. In the event that the Jeff Kidwell cannot be reached, OHM will be responsible for notifying WVDEP.

7. *(8.9 Fire Contingency Measures) Allegheny Ballistics laboratory has a response team to handle emergencies. The Navy should coordinate response measures and procedures with the facility. Outside sources for fire and emergencies may be secondary.*

   Appendix C, Part 8.9 will be revised to indicate that the OHM emergency coordinator will immediately notify ABL's emergency response team in the event of an emergency. The ABL emergency response telephone numbers and pertinent information will be added to Table 8.1. In addition, prior to initiating site work, OHM will meet with ABL's emergency coordinator to review emergency notifications and procedures.

8. *Page 8-14, In addition to contacting LANTDIV ROICC the Navy is required to notify the State. In the event of a spill the Navy should notify the State's spilling at (800)642-3074 and contact Mike Dorsey at (304) 558-5989 and Thomas L. Bass at (304) 558-2745.*

   Acknowledged. OHM will also revise Table 8.1 to include David McBride and Mike Dorsey.

Responses to comments from U.S. Environmental Protection Agency Region III, dated July 1, 1996, on the Sampling and Analysis Plan

1. *Data Quality Objectives - Completeness is not discussed in this document. Precision and accuracy objectives are not quantitatively stated, but are vaguely referenced to the analytical methods. Please state the precision, accuracy and completeness goals for the project.*

   Typically, the resulting data set for the project is desired to be 90% "complete" or usable after review/validation. Since this is being considered high concentration, waste characterization analysis, OHM does not apply the same QC limits to the database. Elevated detection limits or poor spike recoveries are examples of the QC problems that frequently occur.

2. *The plan states (Section 5.3.1) that stainless steel or polypropylene scoops will be used to obtain grab samples. Polypropylene scoops should not be used to collect samples for organic analyses because the polypropylene may cause interferences in the analyses.*

   Containerized soil that is sampled will be analyzed for disposal parameters. Interferences that may be caused by a polypropylene scoop are not of concern due to the fact that those samples would be considered a high hazard and the interferences, if any, would not cause any impact on disposal. In addition, an inert propylene scoop would be favored for its ease of use (quicker as compared to decontaminating stainless steel scoops) and some of the hazards found within the matrix are cause for safety concerns. The chemicals used for decontamination (especially if a Nitric Acid Solution is incorporated) may react with contaminants such as explosives.

3. *Section 6.7 does not include a nitric acid rinse for decontamination of sampling equipment used to collect metals samples.*

   A 10% Nitric Acid Solution rinse followed by a DI rinse should be used to decontaminate reusable sampling equipment. OHM, in this case, is proposing to utilize disposable polypropylene scoops because of health and safety concerns as noted above. Nitric Acid is an oxidizer and some of the metals and explosives could possibly react with the acid. Also, polypropylene scoops can be thrown in with discarded PPE and disposed. This would also eliminate the creation of a new waste stream for the decontamination wash.

4. *Table 6-1*
   - *No holding times are included for TCLP analyses.*
   - *Explosives extracts should only be held for 40 days, not 90 days as stated in the table.*

   Table 6.1 will be revised to indicate the holding times listed above. The revised Table 6.1 in attached.

5. *Include sample preparation methods in Section 8.1*

Section 8.1 will be revised as follows:

Analyte	EPA/SW-846 Method	Est. Quantity
TAL-Inorganics*	6010/7000/9010	36
TAL-Metals	3050B	36
TCL-Organics	8270/8080	36
TCL-Organics Extraction	3540 or 3550	36
TCL-Organics/VOC	8240	36
Explosives	8330	36
TCLP-Full	1311	9

* TAL-Inorganics include analysis for beryllium and mercury:
- Beryllium will be determined at an approximate detection limit of 0.3 µg/L using Method 6010.
- Mercury will be determined at an approximate detection limit of 0.2 µg/L using Method 7471.

6. *Section 8.3 - include the quantity of sample used to determine the Hexane Solubility of an unknown sample.*

This paragraph will be revised to indicate that 1 ml of hexane/dichloromethane will be added to a 1 ml/1g sample.

7. *Table in Section 8.6*
   - *3-40 ml vials should be collected for liquid volatile analyses. Soil samples for volatile analysis should be collected in duplicate.*
   - *Separate samples are required for aqueous samples collected for semivolatile and pesticide/PCB analyses. I recommend collecting two 1 liter containers for each of these analyses.*
   - *Nitric acid is used to preserve aqueous samples for metals analysis, not hydrochloric acid as stated in the table.*

The above comments are acknowledged. The table will be revised as follows:

WASTESTREAM	ANALYSIS		CONTAINER	PRESERVATION
Organic Liquid[1]	TCL	-Volatiles -Semi-Volatiles/ -Pest/PCB:	3x40 ml glass 4x1-L glass	pH<2w/HCl —
Organic Solid[1]	TCL	-Volatiles -Semi-Volatiles/ -Pest/PCB	2x250 ml glass 500 ml glass	— —
Aqueous Liquid[2]	TAL	-Metals -Cyanide	1-L poly or glass 500 ml poly or glass	pH<2 w/HNO_3 pH>12 w/NaOH
Inorganic Solids[2]	TAL	-Metals, Cyanide	250 ml glass	—

8. *Table 8.1 includes ignitability, corrosivity and reactivity analyses for disposal samples. Ignitability samples should be collected in separate containers or analyzed before aliquots are removed from the container for other analyses. This table should include analytical methods for these parameters and preservation/holding time information should be added to Table 6.1.*

   The above comment is acknowledged. The revised Table 8.1 is attached.

9. *Section 9 - I recommend that data be validated according to the Innovative Approaches to Data Validation, June 1995 (M2 level - organics and IM1 level - inorganics).*

   OHM will revise the date validation procedures in accordance with the above.

10. *Section 10.1.5 references Methods 8010 and 8020 for volatiles, while the rest of the plan states that Method 8040 will be used for volatile analysis. Please clarify.*

    The text will be revised to indicate that Method 8040 will be utilized.

11. Section 13.0, #2 states that blanks cannot contain contaminants above acceptable levels. State acceptable levels.

    In reference to Item #2, method blanks should be less than the detection limit (MDL) for the analyte, or less than 5% of the regulatory limit associated with an analyte, or less than 5% of the sample result for the same analyte, whichever is greater. The laboratory control samples differ in that the concentration of an analyte is checked against a regulatory limit. Then the spike should be equal to or less than the regulatory limit. The background concentration could also be used if historical data is available, with acceptance between one to five times the background concentration.

12. *The laboratory is not identified. When the laboratory is selected, please submit for review the laboratory's Statement of Qualifications, documentation of current certifications and performance evaluation results, no more than six months old, for analyses to be performed by the laboratory for this project.*

    Acknowledged. OHM will submit laboratory qualifications which meet this criteria.

13. *Section 14 lists references used to prepare this plan. I recommend using the latest revision of NEESA guidance (1996) and SW-846, Update 2, Sept. 1994 when revising this plan.*

    OHM will revise the reference list to include SW-846, Update 2 and the Navy Installation Restoration Laboratory Quality Assurance Guide, February 1996.

14. *Section 5.2.4 indicates downgrading PPE from Level B to Level C during screening and segregation, based on air monitoring. How will the Navy provide real-time monitoring data that will be needed to make these decisions?*

    OHM does not have the capability to provide real time air monitoring down to the exposure limits for beryllium. OHM will perform segregation work in Level B PPE. The statement regarding downgrading to Level C will be deleted.

15. *Table 8.1 in Section 8.3.2, change the EPA Response Center phone number to (215) 566-3255; also replace Jim Szykman with the new LANTDIV Coordinator.*

    Acknowledged. This table will be revised accordingly.