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MARYLAND DEPARTMENT OF THE ENVIRONMENT
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Parris N. Glendening
Governor

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September 7, 1995

Mr. Jeff Kidwell
LANTDIV
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, Virginia 23511-2699

RE: Draft Final Work Plan Soil Segregation and Analysis, Allegany Ballistics Laboratory Rocket Center, West Virginia, May 1995

Dear Mr. Kidwell:

Enclosed are the Maryland Department of the Environment, Waste Management Administration's (MDE/WAS) comments on the above referenced document.

If you have any questions, please feel free to contact me or Mr. John Fairbank at (410) 631-3440.

Sincerely,

Wendy True Noe
Remedial Project Manager
Federal/NPL Superfund Division

WTN:sg

Enclosure

- cc: Mr. Tom Bass, WV DEP
- Mr. Bruce Beach, EPA Region III
- Mr. Dave McBride, Allegany Ballistics Laboratory
- Mr. J. Greg Mott, CH2M Hill
- Mr. Lou Williams, NAVSEA
- Mr. Richard W. Collins
- Mr. Robert A. DeMarco



**MARYLAND DEPARTMENT OF THE ENVIRONMENT
WASTE MANAGEMENT ADMINISTRATION**

Comments:

Draft Final Work Plan Soil Segregation and Analysis, Allegany
Ballistics Laboratory Rocket Center, West Virginia, May 1995

GENERAL COMMENT

The main body of the above referenced document and Appendix A, the Sampling and Analysis Plan (SAP) were reviewed. Comments on these two parts are included below. The remaining Appendices (Quality Control Plan and Site Specific Health and Safety Plan) were not reviewed because of the number of inconsistencies in the main body and Appendix A. MDE requests the resubmission of the Work Plan and all appendices for regulatory review after incorporation of the comments below and a thorough review of the Quality Control Plan and Site Specific Health and Safety Plan (Appendices B and C).

SPECIFIC COMMENTS

1. Page 1-2, Third bullet
 - a. Please specify which metals will be analyzed using the TCLP methodology.
 - b. In addition to metals, the waste streams should also be analyzed for the presence of explosive materials.
2. Page 2-1, Section 2.1
Please include the definition for "PC truck."
3. Page 2-1, Section 2.2.2
Additional information about the segregation area is needed. Specifically, will the backhoe be able to reach the soil in the roll-offs under the current shelter? Is a roof or other covering planned for the segregation area? Water should not be allowed to mix with the contaminated materials. How will workers enter the segregation area? Please also indicate this on Figure 2.
4. Page 2-2, Section 2.2.4
Additional information about the decontamination pad is needed. For example, what are its approximate dimensions? What will be used to seal the pad? Will personnel and equipment be decontaminated here?
5. Page 2-2, Section 2.2.6
Will the soil surrounding a broken vial constitute a separate waste stream? This soil will likely have higher concentrations than soil surrounding vials that are intact.
6. Page 2-2, Section 2.2.6, fourth paragraph
Where will the one cubic yard boxes be staged? How will the remaining soil be placed into the boxes? Further explanation of the soil screening and segregation is needed.
7. Page 2-3, Section 2.2.7, 1a.

The soil should also be analyzed for explosive compounds.

8. Page 2-3, Section 2.2.7, 1b.
Please specify whether the samples to be analyzed using TCLP methodology will be analyzed for metals only or the entire list of analytes.
9. Page 2-4, Section 2.3.1 and Figure 3
Please clarify the extent of the existing Site 5 landfill. It is unclear whether the thick black line or the thin diagonal lines (labeled, "interpolated extent of landfill") define the extent of the landfill. In addition, please explain the "metal dumpster" noted on the figure.
10. Page 2-4, Section 2.3.1
Please include the rationale for the chosen disposal location within the landfill.
11. Page 3-1, Section 3.1
Figure 2 does not show the project team. Please clarify this reference.

The comments below refer to Appendix A, Draft Final Sampling and Analysis Plan for Soil Segregation and Analysis Allegany Ballistics Laboratory Rocket Center, West Virginia, May 1995

12. Page 1-1, Section 1.1, Fourth paragraph
Is the sampling date of June 23, 1994 correct for this project? Please clarify either the date or location of the sampling.
13. Page 2-1, Section 2.0
Please indicate what type of air monitoring will be performed during site activities.
14. Page 2-3, Section 2.5
Because compounds of both metals may be present as white powder or crystals, will the density difference between the lighter weight mercury compounds and beryllium compounds be sufficient to distinguish the vials? Do the vials all contain the same amount of material? Is there any chance that the two metals could be present in the same vial?
15. Page 3-1, Section 3.1
 - a. How will the random sampling locations be determined? In order for the locations to be "random", the locations must be determined by an approved statistical method before the collection of samples--not by the sampler in the field.
 - b. Please clarify if the samples will be collected from the entire zero to 3 foot interval or any depth between zero and 3 feet.
16. Page 3-1, Section 3.1.1

Will the soil remaining in the stainless steel bowl be poured back into the one cubic yard container from which it was collected? Please discuss. The amount of excess soil collected for each composite sample should be minimized.

17. Page 3-1, Section 3.1.2
Please elaborate on the methodology used to determine the quantity of samples to be collected.
18. Page 3-2, Section 3.2.2
Does the abbreviation "CI" stand for confidence *interval* or confidence level? In addition, the formula is unclear. Please clarify this section.
19. Page 3-3, Section 3.2.2.2
Please clarify the second sentence with the following, "Duplicate soil samples are obtained by splitting the composite sample between two sample containers, after thorough homogenization."
20. Page 5-1, Section 5.3, first paragraph
Please clarify whether a disposable polypropylene scoop or a stainless steel trowel will be used to collect samples from the cubic yard containers. The use of the trowel is mentioned in Section 3.1. In addition, will the samples be contained in one-liter glass bottles or 16-ounce glass containers (as mentioned in Section 3.1.1)?
21. Page 5-1, Section 5.3, second paragraph
The number and type of samples indicated here are inconsistent with earlier portions of this document. Please clarify.
22. Page 6-1, Section 6.1, last line
A duplicate sample is different from a sample requiring two jars. Please insert language similar to that in Section 10.1.1.
23. Page 6-2, Section 6.2
The OHM chain-of-custody is not included in this document.
24. Page 6-3, first line
The "containers, preservatives, and holding times" are presented in Table 6.1. Please change the reference to "Table 4."
25. Page 6-3, first paragraph
Please remove the reference to "samples for geotechnical analysis" unless such samples are to be collected during these site activities.
26. Page 6-3, Section 6.6
See comment number 20.
27. Page 6-3, Section 6.6, last sentence
This is the first mention of lead in this document. Please

clarify.

28. Pages 6-3 and 6-4, Section 6.6
An equipment rinsate and field blank are two different terms for the same type of QA/QC sample. Please clarify this section by including only one term.
29. Page 6-4, Section 6.7
Please include a section explaining the disposition of decontamination fluids.
30. Page 7-1, Section 7.1
Please explain the use of the PID at this site.
31. Page 10-1, Section 10.0, Paragraph five
Please remove the reference "NSB Site" and replace it with ABL Site.
32. Page 10-2, Section 10.2
Please indicate which laboratory will analyze the samples collected during these activities.