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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

July 1, 1996

Commander, Atlantic Division
Naval Facilities Engineering Command
Environmental Quality Division
Code: 1823
Norfolk, Virginia 23511-6287
Attn.: Jeff Kidwell

SUBJECT: Review of draft final Work Plan Site 7, Allegany Ballistics Laboratory, Rocket Center, West Virginia

Dear Mr. Kidwell:

The EPA has reviewed the draft Final Work Plan, Soil Segregation and Analysis, for the soil removed from Site 7 Allegany Ballistics Laboratory (ABL) Superfund Site, Rocket Center, West Virginia.

Until the specific comments on the Sampling and Analysis Plan are addressed the EPA can not approve this Work Plan.

SPECIFIC COMMENTS

Appendix A:

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

5. Include sample preparation methods in Section 8.1.
6. Section 8.3 - include the quantity of sample used to determine the Hexane Solubility of an unknown sample.
7. Table in Section 8.6
 - 3-40ml 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.
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.
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).
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.
11. Section 13.0, #2 states that blanks cannot contain contaminants above acceptable levels. State acceptable levels.
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.
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.

Appendix C:
Health and Safety Plan

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?
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.

If you have any questions concerning any of these comments, please call me (215) 566-3364.

Sincerely,

Bruce W. Beach

Bruce W. Beach
Remedial Project Manager

cc: Paul Leonard, EPA
Tom Bass, WV DEP
Wendy Noe, MDE
Greg Mott, CH2M Hill
Dave McBride, Alliant TechSystems
Lou Williams, NAVSEA