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west virginia department of environmental protection

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Division Of Land Restoration  
Office of Environmental Remediation  
601 57<sup>th</sup> Street, SE  
Charleston, WV 25304-2345  
(304) 926-0455

Joe Manchin III, Governor  
Randy C. Huffman, Cabinet Secretary  
www.wvdep.org

23 October 2008

Naval Facilities Engineering Command, Atlantic  
Michael P. Helbling  
NAVFAC MIDLANT  
HR IPT Environmental Restoration Section  
Remedial Project Manager for ABL  
NAVFAC Mid-Atlantic, Code EV4  
9742 Maryland Avenue  
Bldg N-26, Room 3208  
Norfolk, VA 23511-3095

Re: *Draft Feasibility Study for Groundwater at Sites 11 and 12*

Dear Mr. Helbling:

The West Virginia Department of Environmental Protection/ Division of Land Restoration (WVDEP/DLR) has completed the State evaluation for the *Draft Feasibility Study for Groundwater at Sites 11 and 12 Allegany Ballistics Laboratory, Rocket Center, West Virginia* dated August 2008 and provides the following comments:

1. Page V; Executive summary; third paragraph: The oil pit (SWMU 36) description is not consistent with historic documentation. *Page IV-69 of the Phase II RCRA Facility Assessment for Allegany Ballistics Laboratory Rocket Center West Virginia March 1993 provides the following unit description "This unit consists of a below grade circular pit measuring two feet in diameter and two feet in depth,. . . facility representatives stated that the unit may have served as a transfer hose drip catchment."* Further, the operating period for the oil pit would be from the 1960s through late 1994. Please ensure agreement between current and previous documents, unless the differences reflect actual change in the relevant site features.
2. Page V; Executive summary; third paragraph: The discussion states "It is believed F-Well received waste from area activities between 1961 and 1962." The discussion implies the facility intentional injection/disposal of hazardous substances at F-Well. Historic documentation does not support this discussion. Please review February 14, 1995

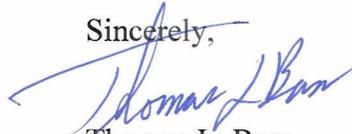
CH2MHill “*Abbreviated Work Plan, Quality Assurance Project Plan, and Field Sampling Plan for the Investigation of F-Well*” submitted by Robert W. Root Jr. to Dave McBride. Please clarify.

3. Page VI; Executive summary; first paragraph: The SWMU 37N discussion is incorrect. As indicated in the 1993 RFA, SWMU 37N was a metal box connected to a concrete trough with a metal grate. The concrete trough traversed the parking area of building 167 and entered building 167 where internal floor drains discharged into the trough. Please review the relevant documents (1993 RFA, SWMU removal documentation) and correct as needed.
4. Page 1-1; Introduction; third paragraph: The discussion states the sites are within the floodplain. Please identify the floodplain (100 year, 500 year?).
5. Page 2-2; Section 2.1.3.1 Site 11; first paragraph: The discussion identifies the oil pit as a “oil disposal pit”. This statement is inconsistent with the 1993 RCRA facility assessment. This document indicates that the oil pit functioned as a “transfer hose drip catchment.” Please correct or provide supporting documentation.
6. Page 2-2; Section 2.1.3.1 Site 11; third paragraph: See comment number 1.
7. Page 2-4; Section 2.1.3.2 Site 12; second paragraph: See comment number 3.
8. Page 2-4; Section 2.1.3.2 Site 12; third paragraph: The discussion centers on SWMU 52 and leaves the reviewer to conclude that the alodine treatment tanks included a secondary containment structure and no evidence of a release to soil or groundwater was observed. This conclusion would conflict with the 1993 RCRA RFA SWMU 12 that suggests a history of releases from the former alodine treatment tank ( “*Evidence of a possible release from the unit was observed during a 1982 inspection. The inspectors noted an area of dead vegetation which had presumably been caused by a release of waste or product. . .*” . ) Please clarify or provide supporting documentation.
9. Page 2-6; Section 2.1.4.2 Site Geology; second paragraph: The discussion indicates “a fracture trace analysis was performed at ABL. . .”. The reference section of the document does not identify this document. Further, it is unclear if the fracture tract analysis was performed for the entire ABL facility or was performed specifically for site 11. Please identify the documentation source or clarify.
10. Page 2-14; Section 2.3.1 Human Health Risk Assessment (HHRA); third paragraph: The discussion provides an assumption that groundwater will most likely not be utilized as a potable-water supply. Since groundwater is impacted above applicable standards, a groundwater use restriction shall be imposed and should be identified in the discussion. Please clarify.

11. Page 3-5; Section 3.5.1 Risk-Based Preliminary Remediation Goals; second paragraph:  
The discussion states “Human health risk-based PRGs were calculated for constituents under residential scenarios with carcinogenic risks exceeding  $10^{-4}$  . . .”. For residential scenarios the carcinogenic risk should be  $10^{-6}$ . Please correct or clarify.
  
12. Page 3-6; Section 3.6 FS COCs Requiring Remediation: Section 3.6 outlines a method of eliminating potential contaminants of concern in a manner not consistent with the applicable regulation. The following text can be found in West Virginia § 22-12 “Where the concentration of a certain constituent exceeds such standards due to natural conditions, the natural concentration is the standard for that constituent. Where the concentration of a certain constituent exceeds such standard due to human-induced contamination, no further contamination by that constituent is allowed, and every reasonable effort shall be made to identify, remove or mitigate the source of such contamination, and to strive where practical to reduce the level of contamination over time to support drinking water use.” Unless the COC(s) are natural concentrations the COC(s) are to be included in the assessment. Please correct.

If you need clarification I can be reached at [Thomas.L.Bass@wv.gov](mailto:Thomas.L.Bass@wv.gov) or (304) 926-0499 extension 1274.

Sincerely,



Thomas L. Bass  
Environmental Resource Specialist  
Office of Environmental Remediation  
Superfund Group

cc: Donald Martin – WVDEP      John Aubert – NAVSEA  
Yi.Ji-Sun – USEPA              Steven Glennie – CH2MHill  
Bruce Beach – EPA              Tim Reisch – NAVFAC