



DEPARTMENT OF THE NAVY

INDIAN HEAD DIVISION
NAVAL SURFACE WARFARE CENTER
101 STRAUSS AVE
INDIAN HEAD MD 20640-5035

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Ser 0952/270
12 Sep 95

Mr. Mike Smagh
EPA Region III
841 Chestnut Building
Philadelphia, PA 19107

Dear Mr. Smagh:

We are writing in response to your comments on the Verification Investigation (VI) Work Plan for the Naval School Explosive Ordnance Disposal (NAVSCOLEOD) sites at our Stump Neck Annex, EPA ID Number MD 417 009 0001. We appreciate your timely review of this document. The following items are submitted in response to your comments.

Several military personnel familiar with historical operations at the Range 6 site have been interviewed. Unfortunately, none of them were able to indicate definitively the actual locations and boundaries of the six test ranges. However, everyone interviewed agreed that the actual detonation of explosives at Range 6 occurred in the lowland area to the south of Archer Avenue. The six wooden placards which exist in the area south of Archer Avenue are the best indication we have of the probable locations of the ranges. Because there is uncertainty in the location and dimensions of the ranges, a grid will be established in the lowland area below Archer Avenue and surface soil samples will be collected and analyzed using D-tech field screening test kits to determine the presence/absence of explosive residues (TNT, RDX, and HMX). If surface/shallow subsurface soil contamination exists, the field screening along the sampling grid should be able to define the approximate locations of the testing ranges within Range 6. The monitoring well at Range 6 will be located based on the results of the field screening for TNT, RDX, and HMX.

Two possible locations for the arsenic pit at Range 6 have been identified based on the interviews with military personnel. Although it is questionable that the arsenic pit even exists, we agree that both locations need to be investigated for the RCRA Facility Investigation (RFI). However, the purpose of the sampling being performed at Range 6 at this time is to determine the type of contamination, if any, that is present at the site as a result of training. The objective of this effort is to use the information obtained to prepare a cost estimate for cleanup to the NAVSCOLEOD. Since the alleged arsenic pit has not been

5090
Ser 0952/270

associated with training activities at Range 6, an investigation of this pit will not be conducted at this time. However, sampling, as required by the RCRA Corrective Actions permit, will be conducted during the RFI.

Finally, as required by the RCRA Corrective Actions permit, environmental samples will be analyzed for Appendix IX volatile and semivolatile organic compounds. Samples will also be analyzed for the Target Analyte List (TAL) of metals, which includes all of the Appendix IX metals and for select energetics (TNT, RDX, HMX), as required by the permit. Select samples will also be analyzed for other analytes not specified in the permit (e.g., polychlorinated biphenyl compounds). Environmental samples will not be analyzed for pesticides as there is no indication that pesticides were used as part of any training activities at the sites under investigation.

If you have any questions or comments concerning this matter, please contact Mr. Shawn Jorgensen of my staff on (301) 743-6745.

Sincerely,



SUSAN P. ADAMS
Director, Environmental Division
By direction of the Commander

Copy to:

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