



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107-4431

March 20, 1997

In Reply Refer To: 3HW90

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Frank R. Peters, Manager
Environmental Restoration Branch
Department of the Navy
Washington Navy Yard Building 212
901 M Street SE
Washington, DC 20374-5018

RE: VI Work Plan Conditional Approval
Indian Head Division
EPA ID No. MD 417 009 0001

Dear Mr. Peters,

The United States Environmental Protection Agency (EPA) has reviewed the Navy's RCRA Verification Investigation (VI) Work Plan dated September 15, 1995, and approves the Work Plan subject to the following conditions:

Section 5 Sampling Procedures

5.4 Mud Rotary Drilling, page 5-6

Mud rotary is not an appropriate drilling method for this type of investigation. The use of mud will alter the pore structure in the sediment around the well intake and reduce the permeability. Only drilling methods that do not inject drilling fluids into the formation are to be used.

5.7 Well Development, page 5-12

Specific conductivity, temperature, and pH must be recorded during development. Development must continue until these parameters have stabilized and the water turbidity is minimal.

5.8 Well Purgings, page 5-14

Ibid.

5.10 Ground Water Sampling, page 5-16

According to EPA Region III protocols, samples to be analyzed for metals must be collected in 1-liter polyethylene bottles.

Section 6 Quality Assurance Plan

6.2.3 Precision and Accuracy, page 6-3

The precision and accuracy information is specific to the analytical methods capabilities. The precision and accuracy limits are quoted from the now defunct 2/88 Contract Laboratory Program Statement of Work. Accurately stated data quality objectives must reflect the data quality requirements needed to meet the overall project objectives.

6.4 Sample Identification, Containers, Preservation, and Labelling, page 6-11

Table 6-5 must include preservative requirements for the water samples to be analyzed by EPA Method 624. The stated 14 day holding time is only valid for correctly preserved samples.

6.7 Data Reduction, Validation, and Reporting, page 6-16

The Region III Modification to the EPA Laboratory Data Validation Guidelines for Evaluating Organic and Inorganic Analyses should be used where applicable. This document can be obtained from EPA,s QA/QC Branch, upon request.

6.8.1 Field Data Quality, page 6-19

Table 6-6 states that the rinsate blank will be collected at the rate of one per week for the duration of the field investigation. The purpose of the rinsate blank is to determine cross contamination which may occur as a result of inadequate decontamination procedures between sampling points/events. The collection and analysis of one per week is not adequately representative of sampling conditions. Additionally, during data validation, this information is one of the parameters used to assess the accuracy of reported sample results. Where non-dedicated equipment is used, rinsate must be collected every day.

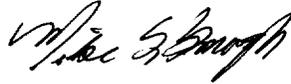
The VI Work Plan must include project schedule.

The deficiencies noted above have the potential to affect the technical adequacy of the investigation and must be addressed prior to commencing field work.

Should the Navy take exception to all or part of the above conditions, the Navy may submit a written statement of the grounds for the exception within 14 days from receipt of this letter.

If you have any questions about this matter, please call Bob Greaves at (215)566-3423 during my absence between March 24th and April 21st.

Sincerely,



Mike S. Smagh, Project Manager
RCRA Operations Branch

cc: Amin Yazdanian, MDE