

03.01-09/26/97-00297



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

Certified Mail
Return Receipt Requested

SEP 26 1997

Mr. James F. Harris
Commander Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, VA 23511-2699

Ref: Final Administrative Order on Consent
U.S. EPA Docket No. RCRA-III-038-CA

Subject: Comments on the Amended Project Plans Sampling for the Phase III RFI
For the Naval Air Station Oceana, Virginia Beach, Virginia (July 1997)

The United States Environmental Protection Agency (EPA) is reviewing the Amended Project Plans Sampling for the Phase III RFI for the Naval Air Station Oceana (NAS Oceana) (sampling plan). Thus far, the sampling plan has been reviewed and commented on by the EPA project team members, myself as the remedial project manager, Mr. Jack Hwang, Hydrogeologist, and Ms. Elizabeth Quinn, Toxicologist. The review will be considered complete pending a review by the Central Regional Laboratory (CRL). Comments are anticipated from CRL on or before September 26, 1997. In the interim, EPA is providing the Department of Navy with the EPA project team members' comments and will forward any comments from CRL upon receipt. In addition, EPA intends to enter into an Interagency Agreement with the United States Army Corps of Engineers (USACE) Norfolk District to conduct split sampling of all samples collected by the Department of Navy during this sampling activity. Therefore, close coordination between EPA, the USACE and the Department of Navy is anticipated to meet an October 1997 mobilization schedule as proposed by the Department of Navy.

Comments on the Sampling Plan

General Comment

1. The methods and quantitation limits are acceptable for most analytes, including dioxin/furans, pesticides, and volatiles. However, the quantitation limits for water achieved by SW-846 Method 8100 exceed health-based screening concentration for analytes such as

benzo(a)pyrene (quantitation limit, 2 micrograms per liter (ug/l), compared to the maximum concentration level of 0.2 ug/l) and other carcinogenic polynuclear aromatic hydrocarbons (PAH). SW-846 Method 8310 will provide adequate quantitation limits and should be used.

2. Coordinate with the Virginia Department of Environmental Quality (VADEQ) to determine whether hazardous waste management disposal, closure and/or post closure requirements are applicable at any of the solid waste management units where hazardous wastes are detected and no further action is recommended (Ex. SWMU 18, 21, 24, and etc.) If closure requirements are applicable, the proposed number and location of the samples do not appear to be adequate.

SWMU 1

1. The thickness of the free phase petroleum in monitoring wells 1-MW4, 1-MW5, 1-PZ5, and 1-PZ3 should be recorded before conducting recovery pumping.

2. The total amount of the free phase petroleum recovered and the method of disposal should be reported.

3. On page 2, it is mentioned that all five soil samples will be analyzed for dioxin and furan. However, in Table 1 only dioxin is listed. Please correct the discrepancy.

4. Provide a rationale for collecting the samples at the specified depths.

5. State which two sample location dioxin/furans were detected during the Phase-I RCRA Facility Investigation (RFI).

6. A soil sample location was not selected near 1-PZ-5, where free product has been detected. Should there be a total of six sample locations proposed for this SWMU, two locations where dioxin/furans were previously detected and four where free product was discovered on the groundwater table? Or is one of the proposed sample locations near a well containing free product and where dioxin/furans were previously detected?

7. My notes and the meeting minutes for the April 29-30, 1997 project meeting with the Navy (reference comment 11 of the RFI/Corrective Measure Study (CMS) May 16, 1997 comment letter) state that the Department of Navy was in agreement with conducting both further groundwater and soil investigations. Please provide a justification for not conducting additional groundwater investigations.

SWMU 2B

1. As discussed at the April 29-30, 1997 meeting, the Department of Navy was to submit the analytical in-situ soil sample results for the Phase I RFI to EPA. In addition, the Department of Navy was to provide a discussion on the findings of these sampling results. Refer to the meeting minutes for the April 29-30, 1997 (comment 15). This information was provided in the attachments to the Department of Navy's August 29, 1997 letter, in response to EPA's May 16, 1997 RFI/CMS comment letter received on September 2, 1997. See EPA's response to the comments for this SWMU in the Department of Navy's August 29, 1997 comment response letter.

SWMU 2C

1. EPA will review the Building 301 and RFI Phase II data and provide additional comments in EPA's response to the comments for this SWMU in the Department of Navy's August 29, 1997 comment response letter.

2. During the April 29-30, 1997 meeting with the Department of Navy, the Department of Navy stated that the sediment samples were to be analyzed for base neutral acids (BNA). However, the text of the sampling plan states that semi-volatile (SVOC) analysis will be conducted but Table 8-2 of the sampling plan includes acids. Confirm which analysis will be conducted on the sediment samples, BNA analysis or SVOC analysis.

3. Please clarify whether the designation for sediment samples should be 2C-SD1 and 2C-SD2 instead of 2C-SS1 and 2C-SS2 in figure 3.

SWMU 2D

1. See comment 3 for SWMU 2C.

SWMU 18

1. The Department of Navy stated during the April 29-30, 1997 meeting that the samples would be collected from a depth of 1.5 inches to 2 inches. Provide an explanation for proposing to collect the sample from a depth of .5 inches.

3. The description of soil sampling at SWMU 18 is too brief. For example, it is important that the confirmation samples be obtained at the edge of the excavated area and that the fill

material not be sampled. A description of how this will be accomplished should be included in the sampling plan. In addition, when will the actual clean up goals for these areas be determined and communicated to EPA? How does the Department of Navy plan to demonstrate that they have achieved the cleanup goals by using these confirmation sample results.

SWMU 21

1. Clarify which samples are shallow and which are deep.
2. The Department of Navy stated during the April 29-30, 1997 meeting that the Department of Navy would resample the sample locations with hits and would expand sampling if additional contamination was detected. Provide a justification for partially abandoning this approach.

SWMU 24 —

1. Specify a rationale for collecting the samples at 2.5 feet.
2. See comment 3 for SWMU 18.

SWMU 25

1. There is a discrepancy with the number of samples proposed in the sampling plan and the Department of Navy's August 29, 1997 letter. The sampling plan states that 3 sediment samples will be collected in the center of the pond. However, the August 29, 1997 letter states that an additional five surface soil samples will be collected to determine the mean back ground pesticide concentrations for this SWMU using statistical methods. Revise the sampling plan to include the collection of the additional soil sampling.
2. EPA will review the remaining information in the Department of Navy's August 29, 1997 comment response letter and provide additional comments in EPA's response to those comments for this SWMU.

In accordance with Paragraph F.14. of the Final Administrative Order on Consent (Consent Order), the Department of Navy is required to submit revisions to this sampling plan and the applicable section of the Department of Navy's August 29, 1997 comment response letter referenced in this letter within sixty (60) calendar days from the receipt of this letter. However, in an effort to meet the proposed October 1997 mobilization schedule as proposed by the Department of Navy, please submit a response to these comments within the next week following the Department of Navy's receipt of this letter.

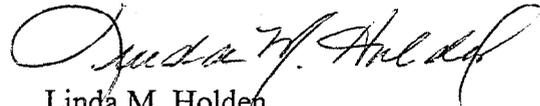
Page 5

Mr. James F. Harris

Subj: Comments on the Amended Project Plans Sampling for the Phase III RFI for the NAS Oceana (7/97)

If you have any questions or concerns regarding the requirement of this letter, please do not hesitate to contact me at (215) 566-3428.

Sincerely,



Linda M. Holden
Remedial Project Manager
RCRA Operations Branch

cc: Robert E. Greaves, 3HW90
Elizabeth Quinn, 3HW70
Jack Hwang, 3HW70
Russel McAvoy, VADEQ
Will Bullard, Department of Navy
N.M. Johnson, Department of Navy
Jack Robinson, CH2M Hill