

1.01-9/15/1992-00461

(804) 445-6911

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1822:JPW

17/5 SEP 1992

United States Environmental Protection Agency
Region III
Attn: Mr. Robert W. Stroud (3HW61)
841 Chestnut Building
Philadelphia, Pennsylvania 19107

Dear Mr. Stroud:

Enclosed is our detailed response to your latest RCRA Facilities Investigation (RFI) workplan comments dated 31 July 1992. As requested, our response is submitted for your review and approval in the form of a RFI Workplan Addendum.

Our response incorporates the agreements made between EPA (Mr. Robert Stroud) and the Navy (Mr. Jesse Waltz) during a 24 August 1992 telephone conversation. As a result of this conversation, it was agreed that the enclosed responses or actions would be appropriate for each of your 31 July 1992 comments. We trust that we have satisfied all your comments and our proposed RFI Workplan is now acceptable. Should you have any questions, please contact Mr. Jesse Waltz at telephone (804) 445-6911.

Sincerely,

N. M. JOHNSON, P.E.
Head
Installation Restoration Section
Environmental Programs Branch
Environmental Quality Division
By direction of the Commander

Enclosure

Copy to:
NAS Oceana (PWD W. Bullard)
CH2M HILL (Mr. Steve Brown)

Blind Copy to:
1822 (JPW)
NAS Oceana Admin Record
18S
NMJDoc: RFIEPA-2

RFI WORKPLAN ADDENDUM
RESPONSE TO EPA COMMENTS
NAS OCEANA

9 SEPTEMBER 1992

1. The first comment requested that the Navy be required to containerize all Investigation Derived Waste (IDW) at site 2b. As a result of our discussions it was agreed that only the IDW from wells 2bMW-1, 2bMW-1D, and 2bMW16 be containerized.
2. The second comment concurred with our calculations not to containerize the decontamination water from the site activities. These calculations were based on the amount of devolatilization and dilution that occurs with the normal decontamination process.
3. The first paragraph of the second page of the EPA comments stated that the EPA policy on who performs the Health and Environmental Assessment (HEA) has changed since the 1989 RFI guidance. It further stated that it is very advantageous for the Navy to perform their own HEA. The Navy has agreed to perform the HEA as shown on pages 3-32 through 3-37 of the Final RFI Workplan.
4. The next comment references page 8 of our 9 June 1992 response concerning analysis for metals. As can be seen by tables 4-1 through 4-3, we are performing all the metals analyses as agreed in our 3 June 1992 meeting at EPA's office.
5. The next comment states that the EPA does not want just the most contaminated samples (as determined by using the HNU) to be analyzed. We agree, sample locations will also be chosen to best define both the horizontal and vertical limits of contamination.
6. The next comment stated that metals have not been added to the analysis for site 1 soils. As can be seen on table 4-3 we are going to perform at least nine analyses for metals in the soil. The text in the RFI report will describe the results of the analyses.
7. Page 20, comment number 63, states that EPA would like to see samples taken in the area of the shack. Samples will be taken in the area of the shack and the RFI report will show the exact locations as well as explain the results of the analyses.

8. Page 23, number 86, EPA would like to see an increased number of rinsate blanks as field checks. The Navy has had an approved procedure for calculating the number of QA/QC samples when performing field work. We intend to use this procedure when performing the RFI field work. Should you disagree or have any specific requirements, please contact this office.
9. The next comment states the metal analyses should be unfiltered. We are performing unfiltered samples in addition to filtered samples.
10. The last comment states that SWMU descriptions should include drainage ditch paths. The RFI Report will show drainage ditch paths.