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LETTER REGARDING DISCREPANCIES IN THE RESOURCE CONSERVATION AND  
RECOVERY ACT FACILITY INVESTIGATION WORK PLAN THAT SHOULD BE CLARIFIED  
NAS OCEANA VA  
3/24/1993  
NAS OCEANA

(804) 445-8855

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MAR 24 1993

U.S. Environmental Protection Agency  
Region III  
Mr. Robert W. Stroud (3HW61)  
841 Chestnut Building  
Philadelphia, Pennsylvania 19107

Dear Mr. Stroud:

The RCRA Facility Investigation (RFI) Work Plan (CH2M Hill June 1992) for Naval Air Station (NAS) Oceana is currently being implemented. During implementation, some discrepancies were noted in the work plan that should be clarified. The discrepancies are discussed below:

- Table 4-4 of the work plan outlines chemical parameters for laboratory analysis. The analytical methods to be used were given along with a listing of the constituents to be analyzed under each particular method. Several constituents were erroneously listed under method SW-8100 for Polynuclear Aromatic Hydrocarbons. Those constituents were:
  - 3-Methylcholanthrene
  - 7H-Dibenzo (c,g) carbazole
  - Benzo (j) fluoranthene
  - Dibenz (a,h) acridine
  - Dibenz (a,j) acridine
  - Dibenzo (a,e) pyrene
  - Dibenzo (a,h) pyrene
  - Dibenzo (a,i) pyrene

The above chemicals are not Appendix IX constituents and are not on the standard SW-846 Method 8100 list in the Federal Register. Their inclusion was a mistake. Therefore, they will not be analyzed as part of this RCRA investigation.

- Method SW-8140 will be used to screen for organo phosphorus pesticides. Early listings of this method included Merphos without qualification. However, recent revisions (1990 and later) have noted Merphos decomposes rapidly to other compounds. The contractor's laboratory cannot perform an analysis for Merphos because it has never been detected through a spiking study. Apparently, Merphos degrades to sub species within hours in a lab standards bottle. Because of its rapid degradation it is unlikely that Merphos persists in the soil sample or in the environment itself.

Merphos will not be analyzed for during the RCRA investigation currently under way.

Our point of contact on this matter is Mr. Jim Steinberg, 804-445-8855, should you have any questions. Your concurrence in this matter is greatly appreciated and will facilitate our mutually effective management of the consent order.

Sincerely,

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

Copy to:

Mr. Steve Frazier  
Environmental Engineer  
Virginia Department of Waste Management  
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NAS Oceana (Mr. Will Bullard, Code 189)

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