

03.01-10/29/96-00250

(757) 322-4776

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1822:JFH:srw

29 OCT 1996

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U.S. Environmental Protection Agency  
Region III  
Attn: Ms. Linda Holden (3HW690)  
841 Chestnut Building  
Philadelphia, Pennsylvania 19107

Re: Response to Hydrogeological Comments on the Proposed  
Selected Alternatives in the CMS for SWMU 15

Dear Ms. Holden:

This letter is a further response to some of the above subject comments from your letter of June 6, 1996 and subsequent discussions with respect to the soil remediation project at SWMU 15.

It is our understanding that the EPA is still concerned that the Navy may be excavating and treating more soil than is necessary at the site (comment 6 of EPA letter). The Navy believes there are enough field data to justify the amount of soil to be remediated. In addition to the soil data, there are test pit data (RFI Phase II Report) and groundwater data with elevated readings of TPH or benzene in the central area where there are no soil samples. Also, discussions with the construction contractor and the consultant, indicate that it would not significantly reduce the cost to "spot" excavate and leave small areas unexcavated within the large open pit.

All other comments from the EPA comment letter of June 6, 1996 were addressed in writing at the August 1, 1996 meeting at the EPA. I have provided another copy for your records.

Re: Response to Hydrogeological Comments on the Proposed  
Selected Alternatives in the CMS for SWMU 15

In order for this project to be a success, the bioremediation needs to start as soon as possible to maintain optimum temperatures for bacterial populations to subsist. Please call me at (757) 322-4776 if you have questions or need additional information with regards to this submittal.

Sincerely,

J. F. HARRIS, P.E.  
Remedial Project Manager  
Installation Restoration Section (North)  
Environmental Programs Branch  
Environmental Division  
By direction of the Commander

Copy to:

NAS Oceana (Mr. Will Bullard) (w/encl)  
CH2M Hill (Mr. Doug Dronfield) (w/o encl)

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18S  
epajws15.jfh

## Comment Response for 2E, 15, and 24

The following comments are a response to the June 6, 1996 EPA letter of the subject: Hydrogeological Comments on the Proposed Selected Alternatives in the Corrective Measures Study Final report for SWMUs 2E, 15, and 24.

**Comment 1:** The Navy will submit a sampling plan as part of the pilot study for source area remediation at SWMU 2e that will provide more pretesting data within the plume. The second benzene plume at geoprobe location 2E-GP24 is localized and the migration of that plume will be monitored using nearby wells as outlined in the base-wide monitoring plan that will be submitted to the EPA soon.

**Comment 2:** The soil borings SB1 through SB 23 did not have any soil samples that were submitted for chemical analyses. These soil borings were drilled to help define (visually and with an OVM) the extent of any free phase petroleum. A discussion of this data is in the Phase II RRI.

**Comment 3:** As the Navy will discuss in our meeting on August 1, we are proposing to perform a pilot study at 2e for groundwater remediation. The results of this study will help us decide whether any containment wells will be necessary.

**Comment 4:** The personnel at Occana have been performing and will continue to perform free product recovery by bailing once/month. At this time, we do not believe a passive skimmer will provide a better recovery at 2e than the bailing based on the slow recovery of the product.

**Comment 5:** The dashed lines will be explained in the text or deleted

**Comment 6:** The Navy has performed a more extensive study of the soil contamination as part of the predesign work at SWMU 15. A copy of these results with a smaller area for remediation will be presented to the EPA at our meeting.

**Comment 7:** The Navy feels as though it is appropriate to use the data from the different types of groundwater collection methods for contouring contaminant plumes. It appears to us that the benzene data from monitoring wells 15-MW9 and MW15 is not necessarily higher than the TPH. Benzene concentrations on Figure A-25 are 740 ppb (MW9) and 270 ppb (MW15). TPH is 790 ppb (MW9) and <500ppb (MW15). In addition, it is possible for benzene to be higher since the TPH method is not very accurate for volatiles (they tend to be lost during the extraction procedure).

**Comment 8:** The maximum concentrations used in the table were from only those samples that went to a fixed laboratory; field laboratory data was not used quantitatively in the risk evaluation. We did not see a significant reason for eliminating the geoprobe collected when we are taking the maximum concentration from all groundwater samples. If we had only used the well samples, then the ethylbenzene would be less.

**Comment 9:** The Navy will provide a monitoring program for this site as part of the basewide monitoring program discussed previously and as a result of the pilot study being performed. In general, the Navy does not feel the low concentrations at some geoprobe locations are indicative of unidentified, significant hot spots.

**Comment 10:** The Navy will provide this report at our meeting on August 1.

1822 (JH)  
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