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LETTER AND RESPONSE TO WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL
PROTECTION COMMENTS ON SITE 1 UNSATURATED ZONE DNSPL INVESTIGATION
ALLEGANY BALLISTICS LABORATORY ROCKET CENTER WV
10/5/2009
CH2M HILL

October 5, 2009

Mr. Thomas L. Bass
West Virginia Department of Environmental Protection
Office of Environmental Remediation Superfund Group
601 57th Street
Charleston, WV 25304-2345

Subject: Response to September 2009 Comments *Site 1 Unsaturated Zone DNAPL Investigation, Allegany Ballistics Laboratory, Rocket Center, West Virginia*

Dear Mr. Bass

This letter is provided in response to your comments on the August 2009 draft *Site 1 Unsaturated Zone DNAPL Investigation, Allegany Ballistics Laboratory, Rocket Center, West Virginia* provided in your letter dated September 28, 2009. Comments are presented (shown in italics) and are followed by the Navy's responses.

General Comments

1. Comment: *Page 1, Purpose, second paragraph: The last sentence should be removed. The focus of the DNAPL investigation would assist in developing alternative remedial action necessary to address the impacted area within Site 1. These alternatives will be presented in the forthcoming feasibility study.*

Response: The requested revision will be made.

2. Comment: *Page 1, Site History, first paragraph: Historically Site 1 was defined as being co-located with the current 8-acre, fenced, RCRA permitted ABG area. Please correct the discussion.*

Response: The requested revision will be made.

3. Comment: *Page 2, Site History, second paragraph: The pit(s) description is not consistent with formally submitted documents. For example the Focused Remedial Investigation for Site 1 Soil, Operable Unit 4, at Allegany ballistics laboratory Rocket Center, West Virginia CH2MHill July 2005. (see page 2-5)*

Response: The site history is consistent with the final version of the referenced document, *Final Focused Remedial Investigation for Site 1 Soil, Operable Unit 4, at Allegany Ballistics Laboratory Rocket Center, West Virginia* (CH2M HILL, July 2006), which was used to provide the historical summary for this technical memorandum.

4. Comment: *Page 2, Site History, fourth paragraph: The discussion states "Site 1 groundwater in the vicinity of the FDPs was investigated as a separate operable unit from soil;". The discussion is incorrect, groundwater and soil were evaluated site wide during the initial remedial investigation. The 11 acre site was broken into two operable units one for groundwater the other for soil. At present no operable unit exist specifically for the FDPs. Please correct the discussion.*

Response: The sentence will be revised to "Site 1 groundwater is considered a separate operable unit from soil; historical groundwater investigations detected DNAPL in the alluvial and bedrock aquifers."

5. Comment: *Page 3, DNAPL Investigation: The proposed investigative techniques are scientifically valid approaches. However, the proposed sampling grid is narrow in focus. In the event NAPL is encountered, the grid should be expanded to delineate the aerial extent of NAPL.*

Response: The purpose of the investigation is to determine if DNAPL is present in site soil beneath the FDPs. In the event DNAPL is determined to likely be present in the soil as a result of former use of the FDPs, an additional delineation on an expanded grid will be recommended to assess the lateral extent. The memorandum will be revised to state that under these circumstances, delineation of principal threat waste would occur during a separate investigation.

If you have any questions or comments regarding the above response to comments, please feel free to contact me at 757-445-6637.

Sincerely,

Michael Helbling

cc: Mr. Steve Glennie/CH2MHill (provided electronically)
Mr. Yi Ji-Sun/USEPA (provided electronically)
Mr. Bruce Beach/USEPA (provided electronically)