



## DIVISION OF ENVIRONMENTAL PROTECTION

1356 Hansford Street  
Charleston, WV 25301-1401

June 2, 1995

GASTON CAPERTON  
GOVERNORDAVID C. CALLAGHAN  
DIRECTOR

Mr. Jeff Kidwell  
Atlantic Division Naval Eng. Command  
Environmental Branch: Code 1823  
Norfolk Naval Base  
Norfolk, Virginia 23511-6287

RE: Comments for the Focused Remedial Investigation of Site 1

Dear Mr. Kidwell:

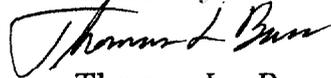
The Office of Waste Management/Site Investigation and Response has reviewed the Draft Focused Remedial Investigation of Site 1, submitted April 13, 1995 and provides the following comments.

1. Pg. ES-4 States "...the source of TCE contamination detected in 1GW13 during the RI is no longer contributing to well 1GW13." This statement has drawn a conclusion based only on a correlation strictly between the difference of two sampling events and does not allow for additional logical explanations. The sentence should be modified to present the information as one possible explanation and not a stated fact.
2. Pg. ES-7 The statement " the effects of this discharge are far reaching," referring to the effluent discharge from the Upper Potomac River Commission Wastewater Treatment Plant should be expounded upon to provide a connection between ABL and the UPRCWTP.
3. A discussion of the corporate change from Hercules to Alliant should be included in the Introduction section of the Focused Remedial Investigation report and any future documents. Furthermore, Alliant should be referenced as the contractor operator in the appropriate sections of the FRI.
4. Prior to Pg. 2-6 there needs to be a discussion of the discrepancy in the analytical results between the ON and OFF Site laboratories and how the analytical results will be used in the Risk Assessment process.
5. Pg. 3-3 states the drum storage pad only stored solvents. The pad was also used for the pilot fluidized incinerator and the storage of explosives.

6. Pg. 3-13 States "PCBs and pesticides were not used at Site 1." this statement has no analytical support and should be removed.
7. Pg. 4-10 are the mines discussed on the north side of the river the drift openings adjacent to ABL? How were the mines examined? I believed the mines were flooded.
8. Pg. 6-18 States "During the Focused RI, two VOCs (bromomethane and VC) not found during the RI groundwater sampling were detected." Should the statement read (bromomethane and toluene)?
9. Table 6-2 sample HCS-BG-128 Chlorobenzne contains a JJ qualifier, should this read J?
10. Table 8-1 Sampling summary reports sample location HCS-B1-3-1 as HSC-B1-3-1.
11. Pg. 8-10 Why were individual congener concentrations used in the risk assessment. There should be a discussion why total congener Dioxin and furan concentrations were not used in the risk evaluation.
12. Pg. 8-11 The statement ABL is zoned industrial is invalid. According to the Mineral county courthouse, Mineral county does not zone commercial, residential, or industrial. Therefore, in the event ABL would cease operation nothing would preclude residential use of the facility.
13. Pg. 8-12 Contaminated Sources, the former storage pad for drums also stored explosives and a pilot fluidized incinerator.
14. Pg. 8-14 The statement referencing zoning is not valid and should be removed. See comment 14.
15. Table 8-5 Evaluation of Hazard Quotients by Target Organ, provides a subscript number 7 under the column contaminant without providing the contaminants' name.

If there are any questions, or if you require further clarification, please contact me at (304) 558-2745.

Sincerely,



Thomas L. Bass  
Environmental Resource Specialist II  
Office of Waste Management  
Site Investigation and Response

TLB/MS/o

cc: Bruce Beach, EPA  
David McBride, ABL  
Steve Hoffman, NAVSEA  
Wendy Noe, MDE