

02.01-05/23/94-00287



DEPARTMENT OF COMMERCE, LABOR & ENVIRONMENTAL RESOURCES
DIVISION OF ENVIRONMENTAL PROTECTION

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May 23, 1994

Mr. Jim Szykman
Atlantic Division Naval Engineering Command
Environmental Branch: Code 1823
Norfolk Naval Base
Norfolk, VA 23511-6287

**Re: Work Plan Construction Investigation for Site 7, Allegheny
Ballistics Laboratory**

Dear Mr. Szykman:

Staff of the Office of Waste Management has reviewed the above referenced document dated April 14, 1994. The following comments have been developed:

1. Excavation and subsequent disposal of the pit contents may not be required by the State at this time. The development of this opinion is based upon the following:
 - The debris mentioned in a 1980 RCRA Inspection Report was not evident in site inspections conducted in 1991 and 1993. Subsequent to the 1980 inspection, this material may have been covered or may have been removed.
 - Sampling results from the Interim Remedial Investigation do not indicate the need for a response. Metals detected, except for Mercury at 28 mg/kg TP-1-2, are comparable to background levels. The elevated mercury level is well below the Risk Based Concentration Level of 310 mg/kg for industrial soils and comparable to the Risk Based Concentration Level of 23 mg/kg for residential settings. It should be noted that the Draft RI Report submitted by CH2MHILL incorrectly reports that a mercury TCLP level of .18 mg/l was detected during the interim RI. The actual result reported in APPENDIX E to the Weston Report for the Interim RI is 1.8 ug/l.

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- This option would have to be supported with 6-10 confirmatory samples taken at several locations from varying depths. Should analytical results from this event, coupled with ground water information, support the conclusion that no threat exists at the site, removal or capping and post-closure monitoring would not be a requirement.
- 2. The topographically upgradient bales and silt fence may prove effective in preventing run-on. To prevent possible migration of contamination through run-off, further control measures should be located down slope of the excavation site.
- 3. In 2.1.2 Soil and Debris excavation, it is stated that personnel will not enter the excavated pit. However, confirmatory sampling of the base and at midpoints of the side walls are to be performed indicating the need for personnel to enter the pit. If this is the case OSHA excavation regulations shall be followed to ensure personal safety.
- 4. Under 6.1, Geotechnical Quality Control Procedures, the statement that the test equipment is calibrated on regular intervals is too ambiguous. Indicate a specific time frame for the proper calibration procedures.
- 5. Given the area in question, the disposal process, and possible leaching of contaminants, it appears that 1 sample at the base is inadequate to give a clear representation if the area is free from contamination.
- 6. In the RCRA Inspection of Allegany Ballistics Laboratory trip report, June 25, 1980, by Joe Hughart, West Virginia Division of Water Resources (WVDWR), Site 7 was identified as:

...An inactive landfill closed during the mid 60's is filled with plastic lab bottles and rusted 5-gallon drums containing beryllium wastes....

This suggests possibility of encountering buried or partly submerged containers. As a precautionary measure, the Navy might consider using ground penetrating radar or other type of detection system or device to estimate the location and depth of possibly buried drums or containers.

- 7. In Appendix B, Section 2, sub sections 2.1, Post-excavation soil sampling, and 2.2, Disposal sampling are missing. It is not clear to this Office whether backfilling is intended to take place after lab results from the post-excavation sampling are received. Indications provided by field sampling with a PID will not reflect metals of concern.

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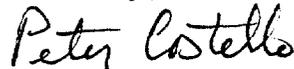
8. Please provide a tentative work schedule outlining proposed daily activities prior to actual construction. Once construction begins, please fax an informal daily construction report to the Site Investigation and Response Office in care of Peter Costello or Tom Bass, The fax number is (304) 558-0256.

These reports can be a simple hand written summary of work performed. This office requests that the following information be included:

- a. Date of work conducted.
- b. A brief summary of the work accomplished.
- c. Deviations from the work plan or tentative schedule noted.
- d. Work anticipated to occur during the following 2 days.

Should you have any questions, I may be contacted at (304) 558-2745.

Sincerely,



Peter Costello
Site Investigation and Response
Office of Waste Management

PC/MS/PH/o

cc: Ken Ellison, OWM
Bruce Beach, EPA
John Britvec, OWR