

2/21/01-01795

(757) 322-4795

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EV23DO:EVS

FEB 21 2001

US EPA Region III, 3HS13
Attn: Mr. Bruce Beach
1650 Arch Street
Philadelphia, PA 19103-2029

Subject: SWMUs 37C, 37BB, 40 and AOCs M and O at Allegany
Ballistics Laboratory

Dear Mr. Beach:

The intent of this letter is to respectfully request the transfer of Solid Waste Management Units (SWMUs) 37C and 40 from Appendix A of the Allegany Ballistics Laboratory (ABL) Federal Facility Agreement (FFA) to Appendix B. In addition, we would like to incorporate SWMU 37BB and Areas of Concern (AOCs) M and O into Appendix B. Appendix A of the FFA is comprised of a list of Site Screening Areas and Appendix B is comprised of a list of Areas of Concern at ABL. The rationale for the above changes is presented below.

SWMU 37C consisted of a concrete wastewater sump located northwest of Building 12. Previous investigation indicated that PETN was detected in soil adjacent to the sump. The sump also contained visible cracks with staining on the south, east and west faces of the concrete structure. In 1997, this sump was removed under State authority. Groundwater related to this area is currently being captured and treated by the Site 10 extraction system and treated at the Site 1/10 water treatment facility. As a result of actions taken to date at SWMU 37C, the Navy is requesting concurrence from WVDEP and the USEPA to transfer SWMU 37C from Appendix A into Appendix B of the ABL FFA.

SWMU 40 consisted of a laboratory exhaust filter located on the outside southern wall of the Strand Bomb Testing Laboratory at Building 12. It was approximately 18 inches

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above ground surface and the majority of the surrounding ground surface was covered with cement. Exhaust from the test operations conducted in the westernmost testing room of the building was discharged through the unit. In 1997, this laboratory exhaust filter was removed under State authority. Groundwater related to this area is currently being captured and treated by the Site 10 extraction system and treated at the Site 1/10 water treatment facility. As a result of actions taken to date at SWMU 40, the Navy is requesting concurrence from WVDEP and the USEPA to transfer SWMU 40 from Appendix A into Appendix B of the ABL FFA.

As discussed in the June 2000 ABL project managers meeting, it was determined by all parties that SWMU 37BB, and AOCs M and O warranted inclusion into Appendix B of the ABL FFA.

Building 7 was serviced by two concrete wastewater sumps, SWMUs 37BB and 37B. These sumps received wash-down from automotive maintenance activities during the 1940s until 1999. All conveyances discharging into sumps 37B and 37BB were disconnected and/or plugged by ATK in March of 1999 as part of a sanitary sewer upgrade project. SWMU 37B is currently listed in Appendix B of the ABL FFA. Since 37BB was utilized in the same manner as 37B, it is the Navy's position that SWMU 37BB be incorporated into Appendix B of the ABL FFA.

AOC M consists of small-scattered solid waste landfills located adjacent to Site 1. AOC O is the designation for the impact area from Ranges F, G, and H. These areas require further evaluation to assess their impact to the environment. The Navy is requesting concurrence from WVDEP and the USEPA to incorporate AOC M and O into the ABL FFA.

Please provide concurrence from your agency for the following changes to the ABL FFA at your earliest

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convenience. If you should have any questions or concerns,
please feel free to contact me at (757) 322-4795.

Sincerely,

D. T. O'CONNOR
Remedial Project Manager
Installation Restoration Section
South
Environmental Programs Branch
Environmental Division
By direction of the Commander

Copy to:

NAVSEA (Messrs. Steve Hoffman, John Aubert, Lou Williams,
Dave McBride)
ATK (Mr. John Waugaman)
WVDEP (Mr. Thomas Bass)
CH2M Hill (Mr. Brett Doerr)
Administrative Record File
(Allegany Ballistics Laboratory, WV)

Blind copy to:

EV23, 09C (DS), EVS, AOC SWMU Status.DO