

NAVY RESPONSE TO EPA COMMENTS DATED AUGUST 17, 2006 ON THE DRAFT RCRA FACILITY INVESTIGATION WORK PLAN FOR SWMUs 16, 27, 28, 29, AND 42, AND AOC A DATED JULY 13, 2006

EPA REGION II COMMENT

EPA has completed its review of the Draft RFI Work Plan for SWMUs 16, 27, 28, 29, 42 and AOC C, dated July 13, 2006 (the Work Plan). The work plan is designed to implement Phase I RFIs at these 6 SWMUs and AOCs, and is expected to be required under the draft 7003 Order currently under development. As part of our review, EPA requested our contractor, Booz Allen Hamilton (BAH) to review the work plan. Based on this review, several items require clarification and/or revision, prior to EPA's approval of the Work Plan. These are discussed in the enclosed Technical Review. Within 25 days of your receipt of this letter, please submit revised pages and Figures and/or written responses which address the comments in the enclosed technical review.

[Navy Response to EPA Region II Comment](#)

[Comment noted. Please see the Navy responses to BAH Technical Review below.](#)

**BAH TECHNICAL REVIEW ON THE
DRAFT RCRA FACILITY INVESTIGATION WORK PLAN FOR
SWMUs 16, 27, 28, 29, AND 42, AND AOC A DATED JULY 13, 2006**

I SPECIFIC COMMENTS

BAH Specific Comment 1

1. Although the introductory paragraph of this section indicates that site topography, facility operational features, and anticipated groundwater flow direction were considered in selecting sampling locations for the Phase I RCRA Facility Investigation (RFI), rationale should be provided to explain why proposed sampling locations at solid waste management unit (SWMU) 27 are clustered at the northeastern corner of the sludge drying beds. In addition, justification should be provided for the lack of proposed sampling locations west of the water purification plant lagoons at SWMU 42. According to Section 2.1.5, topography in this location moves from a high point in the east to a low point in the west. Given this surface topography, it is possible that runoff and/or releases from the lagoons moved westward, and a sampling location in this direction seems appropriate.

[Navy Response to BAH Specific Comment 1:](#)

[SWMU 27: The proposed sampling locations were field verified and considered site topography. Site topography along the southeastern and southwestern facility boundaries is a steep, rocky slope that prevents access with subsurface sampling equipment. Surface soil samples were chosen at the northern end of the sludge drying beds at the location of mechanical joints. This location will capture potential spills during maintenance of the piping which transferred sludge to the drying beds. Additional surface soil samples were chosen in this area to capture drainage from the concrete slab located west of the sludge drying bed. This would capture runoff if the sludge spilled out of the bed onto the concrete slab. The entire western side of the sludge drying beds is concrete and provides a barrier of potential overtopping of sludges.](#)

SWMU 42: The layout of utilities at the facility may preclude accessibility of subsurface sampling equipment to areas along the western portion of the facility. However, in order to provide a more extensive view of the property, sample SB-02 will be relocated to a point along the western site boundary.

BAH Specific Comment 2

2. Based on its former usage as a torpedo shop, it would appear that samples collected at area of concern (AOC) A (i.e., soil, groundwater, wipes, and concrete chips) should also be analyzed for explosives constituents. The RFI work plan should be revised in this section and subsequent related sections addressing the other media referenced above. If sufficient justification exists for omitting the requested analysis, such rationale should be provided for review.

Navy Response to BAH Specific Comment 2:

The torpedoes refurbished and maintained at AOC A, The Torpedo Shop, were drones. The motor utilized to propel the drones was refueled with Otto Fuel at this facility. No explosive constituents were contained in the drones since they were used for target practice. No explosives were stored or utilized within AOC A. Therefore, analytical parameters for samples collected from AOC A will not include analyses for explosive constituents.

BAH Specific Comment 3

3. According to this section, sediment samples will be homogenized before being placed into sample jars and sent to the analytical laboratory. To minimize volatilization and loss of constituents prior to analysis, the portion of each sediment sample to be sent for volatile organic compound (VOC) analysis should be containerized before homogenization is performed.

Navy Response to BAH Specific Comment 3:

The text will be revised in the Final Work Plan to specify that samples for VOC analysis will be placed into the sample jars prior to homogenization of the sediment sample.

BAH Specific Comment 4

4. Because the scope of the proposed Phase I RFI field efforts is not extensive, it is recommended that a single combined summary report be prepared for all of the SWMUs and AOC included in this RFI work plan, rather than a set of six separate reports. In addition, because background information appears to be similar between the sites (e.g., SWMUs 27-29), individual reports could be highly repetitive and inefficient to produce and review.

Navy Response to BAH Specific Comment 4:

The Navy will not combine the summary report for the six SWMUs, but maintain separate summary reports for each facility. The ultimate goal of the Navy's program is to transfer the parcels from its ownership. Maintaining separate reports for each parcel and tracking completions separately will most easily accomplish this goal while providing easier follow-ups.

BAH Specific Comment 5

5. According to this section, NAPR proposes to screen soil and groundwater results against EPA Region III Risk-Based Concentrations (RBCs). Whereas the Region III RBCs consider exposure via ingestion and inhalation routes, EPA Region IX Preliminary Remediation Goals (PRGs) also consider exposure via dermal contact. For this reason, the PRGs are generally considered more conservative indicators of risk, and screening of site data against the PRGs is typically preferred over the use of EPA Region III RBCs. Unless specific justification can be provided for the use of Region III RBCs, the work plan should be revised to mandate use of Region IX PRGs for screening soil and groundwater results.

Navy response to BAH Specific Comment 5:

The work plan is revised to use the Region IX PRGs (soil and tap water) for screening soil and groundwater results instead of the Region III RBCs.

BAH Specific Comment 6

6. According to this section, Ms. Janna Staszak will serve as the Activity Coordinator for this project. Figure 6-1, however, indicates that Ms. Jamie Butler will be serving in this position. Revise the RFI work plan to indicate the actual staffing for this assignment.

Navy Response to BAH Specific Comment 6:

Figure 6-1 was corrected prior to the printing of the Draft RFI Work Plan for SWMUs 16, 27, 28, 29, 42, and AOC A; however, the electronic copy was not updated with this correction. The print and electronic copies of the Final RFI Work Plan for SWMUs 16, 27, 28, 29, 42 and AOC A will incorporate the name change.

BAH Specific Comment 7

7. NAPR should revise this table as needed to specify the most recent version of each method (e.g., SW7470A, SW7471A, SW9012B, SW9030B). EPA's online test methods manual (found at: www.epa.gov/epaoswer/hazwaste/test/main.htm) should be consulted in responding to this comment. The same revisions should be incorporated into Table 3-4 of the RFI work plan.

Navy Response to BAH Specific Comment 7:

Table 3-7 was revised to reflect the most recent version of the methods listed above. Table 3-4 does not specify the analytical methods; therefore no revision is required for this Table.

BAH Specific Comment 8

8. It is extremely difficult to identify the locations of the various SWMUs and AOC A on this figure. Unit labels for the SWMUs/AOCs to be investigated under this work plan should be made significantly more prominent in order to increase the usability of this figure.

Navy Response to BAH Specific Comment 8:

Comment was noted and Figure 1-2 was updated as recommended.

BAH Specific Comment 9

9. The color-coding shown in the legend for this figure is reversed, and should be corrected to identify red flags as wipe sample locations and blue flags as concrete chip sample locations.

Navy Response to BAH Specific Comment 9:

Comment was noted and the Figure 3-7 was updated to reflect the correction.