

FROM : ARARAT E BILES Indian Head MD PHONE NO. : 301 283

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Ms. Susan P. Adams, Head
Safety Department
Indian Head Division
Naval Surface Warfare Center
101 Strauss Avenue
Indian Head, MD 20640-5035

November 27, 1996

REF: IR Site 57 EECA

Dear Ms. Adams:

Following are my comments with respect to IR Site 57 EECA as requested in your letter of November 18, 1996.

CONCLUSION: From the information provided and pending the results of the SVE pilot-scale test (which was to have been done the first week of November 1996) SVE is recommended as the best alternative for restoration of site 57, the former drum loading area (TCE). Although from the options presented the SVE appears to be the best it is not without risk and it is strongly urged that careful attention be given to site monitoring during the removal operation.

SPECIFIC CONCERNS

A. Human Exposure. The Engineering Evaluation Cost Analysis (EE/CA) prepared by Brown & Root Environmental, October 1996 identifies on pages 3-2 to 3-3 the potential for worker exposure to TCE. The report does not mention what safeguards, if any, the contractor will take to minimize the worker exposure during the removal action.

Recommendation: Each employee or worker at the site should be given and sign a statement as to the health risks involved. Appropriate clothing and decontamination procedures should be posted and monitored.

B. Groundwater Contamination. The Brown & Root report states on page 3-2 that "...TCE may migrate from the shallow subsurface...to deeper layers of soil and groundwater".

1. What steps are being taken to monitor this potential?
2. Although the report may be correct in suggesting that "future residential use is not considered likely" the potential migration to deeper soils and groundwater should be monitored. What plans are being taken to do this? Please provide specifics.
3. Although future residential use may not be considered likely what potential risk does the contamination of water impoundment's and soils have on the food chain and to the

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wildlife in the area? Specifically have any tests been done on the deer population and if the resident herd is culled-out from time-to time is the meat considered safe for human consumption?

C. Other.

1. Over and above what may be considered the "health and safety" responsibilities of the contractor and the site review by EPA and other agencies, what overview will the NSWC's Safety Department take?

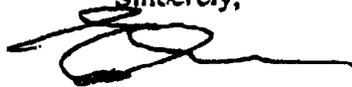
2. During the removal operation will any monitoring of air quality in the area be conducted? By whom? Any monitoring should be done by an independent source (not the contractor).

3. The RAB committee members were never given any in-depth briefing as to the potential volatility or health risks that may result from exposure to the chemical TCE. Copies of the "Material Safety data Sheet" should be made available.

4. Page ES-1 of the Brown & Root report indicates a SVE pilot-scale test was scheduled for the first week in November, 1996 to evaluate IR site 57. It is suggested that a summary of the results of this pilot test be mailed to RAB members as soon as possible.

Thanks for the opportunity of commenting. Call me if you have any questions.

Sincerely,



Elmer S. Biles
283 6298