



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107-4431

March 21, 1997

In Reply Refer To: 3HW90

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Frank R. Peters, Manager
Environmental Restoration Branch
Department of the Navy
Washington Navy Yard Building 212
901 M Street SE
Washington DC 20374-5016

RE: RFI Work Plan Conditional Approval
Indian Head Division
EPA ID No. MD 417 009 0001

Dear Mr. Peters,

The United States Environmental Protection Agency (EPA) has reviewed Navy's RCRA Facility Investigation Work Plan (RFI) dated October 20, 1995, and conditionally approves the Work Plan subject to the following conditions:

Section 4 Field Sampling Plan

- 4.1 Chicamuxen edge Dump Site A / Range 3 Burn Point, page 4-2, paragraphs 2 & 3

This section notes that samples taken below the saturated zone will be visually inspected for contamination. This section also states that if contamination is observed in surface sediments or surface water, these media will be sampled. Both of these procedures lack detail and rationale. While some of the contaminants of concern may result in staining or odors, others do not. collection of samples based on visual observation may result in incorrect or incomplete assessment of the nature and extent of contamination. These procedures require further development.

- 4.2 Range 6, page 4-4

Soil samples must be taken at 0-6" depth and thence at 5-foot intervals.

Section 5 Sampling Procedures

5.1.3 Soil Gas Survey, page 5-1

Please clarify as to at what foot interval the internal grid will be established.

5.3 Hand Auger Procedures, page 5-6

Auger holes must be backfilled with clean soil or grout. The holes must not be filled with drill cuttings.

5.4 Soil Boring/Monitoring Wells, page 5-7

No mud rotary be used for drilling wells. The mud will alter the pore structure in the sediment around the well intake and reduce the permeability. Only drilling methods that do not inject drilling fluids into the formation are to be used.

5.10 Ground Water Sampling, page 5-17

According to EPA's Region III protocols, samples to be analyzed for metals must be collected in 1-liter polyethylene bottles.

Section 6.0 Quality Assurance Plan

6.2.3 Precision and Accuracy, page 6-3

The information regarding precision and accuracy are specific to the analytical method capabilities. Additionally, precision and accuracy limits are quoted from the now defunct 2/88 Contract Laboratory Program Statement of Work. Accurately stated data quality objectives must reflect the data quality requirements needed to meet the overall project objectives.

6.4 Sampling Identification, Containers, Preservation, and Labelling, page 6-9

Table 6-5 must include preservatives requirements for the water samples to be analyzed by EPA Method 624. The stated 14 days holding time is only valid for correctly preserved samples.

6.7 Data Reduction, Validation, and Reporting, page 6-16

The Region III Modification to the EPA Laboratory Data Validation Guidelines for Evaluating Organic and Inorganic

Analyses should be used where applicable. This document can be obtained from EPA's QA/QC Branch upon request.

6.8.1 Field Data Quality, page 6-19

Table 6-6 states that the rinsate blank will be collected at the rate of one per week for the duration of the field investigation. The purpose of the rinsate blank is to determine cross contamination which may occur as a result of inadequate decontamination procedures between sampling points/events. The collection and analyses of one per week is not adequately representative of sampling conditions. Additionally, during data validation, this information is one of the parameters used to assess the accuracy of reported sample results. Where non-dedicated equipment is used, rinsate must be collected every day.

The RFI Work Plan must include project schedule.

The deficiencies noted above have the potential to affect the technical adequacy of the investigation and must be addressed prior to commencing field work.

Should the Navy take exception to all or part of the above conditions, the Navy may submit a written statement of the grounds for the exception within 14 days from receipt of this letter.

If you have any questions in this matter, please call Bob Greaves at (215)566-3423 during my absence between March 24th and April 21st.

Sincerely,



Mike S. Smagh, Project Manager
RCRA Operations Branch

cc: Amin Yazdanian, MDE