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DEPARTMENT OF THE NAVY
ENGINEERING FIELD ACTIVITY CHESAPEAKE
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WASHINGTON DC 20374-5018

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NSWC INDIAN HEAD
5090.3a

IN REPLY REFER TO:

5090
181/RS

150 3 1997

Mr. Mike Smagh
EPA Region III
841 Chestnut Building
Philadelphia, PA 19107

Dear Mr. Smagh:

It is the intent of this letter to provide you with a progress report of our current environmental investigation at Naval Explosive Ordnance Disposal Technology Division (NAVEODTECHDIV) Stump Neck. Since our last correspondence dated 20 May 1997, the field work for the Verification Investigation (VI) and RCRA Facilities Investigation (RFI) for SWMUs 1, 4 and 6, and SWMUs 2, 3 and 5, respectively, have been completed. Chemical analysis of the samples and data validation have also been completed. The draft report is currently being developed, and it is due to be completed in February 1998. Copies will be delivered to both you and Mr. Dennis Orenshaw from the EPA Office of Superfund Programs.

In recent conversations with Mr. Orenshaw, it is apparent that the Navy, EPA and the Maryland Department of the Environment are in agreement that EPA oversight of environmental restoration at NAVEODTECHDIV Stump Neck, particularly those sites under the current Corrective Action Permit, will soon be transferred from the EPA Office of RCRA Programs to the EPA Office of Superfund Programs. This transition will incorporate the Stump Neck program with the environmental restoration program of Indian Head Division, Naval Surface Warfare Center (IHDIVNAVSURFWARCEN). This administrative change will be documented in the Federal Facilities Agreement which is currently under development and should be completed early next year.

In view of the pending change, we have begun to request input from Mr. Orenshaw in matters related to the Stump Neck environmental restoration program. A review of our methodology for performing the human health and ecological risk assessments for the recent VI and RFI investigations was requested from Mr. Orenshaw since it appears that he will be responsible for review of the final report. A copy of this methodology has been attached for your information as well.

With respect to the RFI Work Plan submission for SWMUs 25, 26 and 27, we request that the submission be delayed further, until after completion of the FFA, to avoid wasted duplication in effort. Given the pending administrative change, the Navy would prefer that review of the Work Plan for any further necessary investigation be conducted by the EPA office responsible for review of the Final Report. This will allow the Navy to better structure the environmental investigation to address the concerns of the EPA office that will be in review of the program.

If you have any questions or concerns in this matter, please contact Mr. Robert Sadorra at (202) 685-3275.

Sincerely,


Frank R. Peters
Manager,
Environmental Restoration Branch
By direction of the Commanding Officer

Encl:

- (1) Summary of Risk Assessment Methodology
- (2) Technical Memorandum for Risk Assessment Methodology

cc: Mr. Dennis Orenshaw