



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

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NSWC WHITE OAK
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September 5, 2000

Mr. Walter Legg
Engineering Field Activity Chesapeake
Washington Navy Yard, Building 212
1314 Harwood Street, S.E.
Washington, DC 20374-5018

Re: Draft Work Plan for Site 47 (Building 90 Drainage), The Former Naval Surface Warfare Center (NSWC) White Oak

Dear Mr. Legg:

The United States Environmental Protection Agency Region III has reviewed the above report and has the following comments:

GENERAL COMMENTS

1. Procedures for sampling storm sewers and for determining the downstream limit of contamination was not provided. In addition, the WP has not included information, such as bottleware requirements and preservatives.
2. The text states that one of the objectives of this investigation is to define the source of the polychlorinated biphenyl (PCB) contamination. Several issues should be addressed:
 - It is EPA's understanding that the floor, where the transformers were, was previously refloated. The Navy should mention this in the report to address the rationale why they do not plan wipe samples or chip samples for the basement of Building 90, the suspected source of the contamination. An investigation of the basement of Building 90 should be considered, since it is the only building on the storm drain system that drains into the stream above the PCB contamination and transformers were located in the basement.
 - The text does not state whether the transformer(s) in the basement of Building 90 were removed. It is EPA's understanding that the transformers were removed.
 - A determination of whether the source is continuing to contribute PCBs to the stream should also be made.

3. Procedures for determining the limit of downstream contamination should be provided in the text. EPA recommends that field PCB immunoassay test kits be used to approximate the downstream limit of contamination and samples be collected for fixed-base laboratory analysis to confirm the results.
4. The "stream" or drainage swale under investigation was not described in the text. Details regarding the water regime (perennial, intermittent, or ephemeral) should be provided as well as the bed material (e.g. gravel, cobble).
5. A table containing details regarding sample quantities, containers, preservation requirements, holding times, and analytical methods should be provided or the appropriate sections referenced from the Master Workplan (June 1998).
6. A section delineating lines of authority and responsibilities of key individuals should be added to the text.

SPECIFIC COMMENTS

1. **Section 1.2, page 1-1.** This section states that previous investigations documenting the PCB contamination in the stream have occurred. This previous investigation(s) should be referenced in the text.
2. **Section 2.1, page 2-1.** The text states that EPA contract laboratory program statement of work (CLP SOW) OLM03.1 will be utilized for target compound list (TCL) pesticide/PCB analysis for this investigation. The most recent CLP SOW for TCL organics is OLM04.2. The text should be revised.
3. **Section 2.2, page 2-1.** This section states that two subsurface soil samples will be collected near/along the storm drains in the vicinity of Building 90. It is unclear what these samples will accomplish. The storm drain conveyed PCB contamination to the stream. Therefore, the drain must be intact. These samples are not likely to be contaminated. In addition, provisions for locating the underground drain in the field are not included in the WP. Sampling sediment within the drain would provide more meaningful information.

This section also says that some samples will be collected at a depth of 6 to 18 inches below the stream bottom. Procedures for collecting these samples should be provided in the text.

The text states that stream width measurements will be collected to quantify the volume

of PCB-contaminated sediment. However, samples are not proposed for the banks of the stream. PCB immunoassay test kits should be utilized in several locations to estimate the width of PCB contamination that may be the result of sediment transport during overbank flood events. The results should be confirmed with laboratory samples.

4. **Section 3.1, page 3-1.** This section states that PCB test kits will be utilized during this investigation if possible. There are several types of PCB test kits that yield different levels of accuracy. The kit that will be used should be specified, and procedures for its use, or an SOP, should be provided in the text.
5. **Section 3.7, page 3-2.** This section says that trip blanks will be collected. The WP specifies analysis for pesticides and PCBs only. Therefore, trip blanks will not be required. The text should be amended.
6. **Figure 3.** This figure provides the location of sewers in the Building 90 area. The ends of two storm drains in the Building 90 area are labeled with "spill." It is unclear whether this suggests that a spill occurred in this area or whether this is a term for spillway. This issue should be explained in the text.

If you have any questions, please call me at (215) 814-3369.

Sincerely,



Yazmine J. Yap-Deffler
Remedial Project Manager
Federal Facilities Section

cc: Jeff Thornburg, MDE
Steven Richard, GSA