



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

Section: 13.01  
Site 20903-5640 (White Oak)  
Doc. #: 0033

00455

N60921.AR.000317  
NSWC WHITE OAK  
5090.3a

September 15, 2000

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

Re: Review of TTNUS Response to EPA Comments on the Draft Field Investigation Report for Explosives Contamination Investigation for 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:

1. The responses to EPA comments under the General Comments section are acceptable. The expanded and detailed analysis of false positive and false negative TNT and RDX field screening results provided in the responses clarified the uncertainties of the field screening results (as discussed in the initial EPA comment letter, July 21, 2000).
2. **Specific Comment 1.** The response indicates that further sampling of the underground tank near Earle Road is not warranted because explosives were not detected in soil in the area. The area around the tank contained a shock tube, an altitude blast chamber, and air blast field laboratory. Similar explosive testing facilities on base (e.g. Building 327) have underground tanks for storing washdown fluids. A detailed history of the possible use of the tank and the tests that occurred at this site should be included in the text. Additional sampling of soil below the tank, or wipe samples within the tank should be considered.
3. **Specific Comments 7, 8, and 9.** These comments deal with disparities between duplicate pairs of samples. The responses indicate that resampling is not warranted because the explosives detected were below screening values. The discussion of four field duplicate pairs on page 3-8 acknowledges imprecision but does not include an explanation for the imprecision observed. Although the analytical results were below the Region III RBC for nitroglycerine (46 mg/kg), one duplicate pair revealed TMETN at 0.74 J mg/kg and 35.1 mg/kg. A discussion of whether the imprecision observed in duplicate pairs was due to a nonhomogeneous sampling matrix or other factors should be provided.

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