



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

Section: 2.01
Site 20903-5640 (White Oak)
Doc. #: 0022

00050

N60921.AR.000269
NSWC WHITE OAK
5090.3a

March 3, 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 Draft Site 3, Pistol Range Landfill, Action Memorandum for the Former
Naval Surface Warfare Center

Dear Mr. Legg:

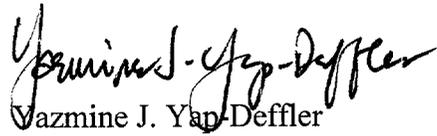
The United States Environmental Protection Agency Region III has reviewed the above document and has the following comments:

1. Purpose Section, Page 1. This section needs to be more specific with the objective of this removal action. It is the EPA's understanding that the purpose of the time critical removal action was to reduce and/or prevent further releases of contaminants from Site 3 from entering Westfarm Branch Creek and to control further erosion of the landfill. The last statement "To reduce or eliminate the contaminant releases at Site 3, the removal action . . ." is too general and gives the impression of a remedial action taking place.
2. Removal Action Objectives, Page 4. This should be part of the Purpose Section. Delete this section.
3. This action memorandum should include an Endangerment Determination section. Please refer to the EPA guidance document, (that I have sent you), "*Superfund Removal Procedures, Action Memorandum Guidance*," December 1990.
4. Proposed Action and Cost Section. This section needs to have more information as discussed below:
 - **Contribution to remedial performance.** This narrative should be included under this section. This should discuss how the proposed action affects any long term remedial actions planned for this site.
 - **Description of alternative technologies** (Alternative Actions Considered). Provide detailed description of the alternatives selected and how each would meet ARARs. Also, since this is a time-critical removal reference to the draft EE/CA is not necessary. The EPA recommends removing any reference to the EE/CA report in this memorandum since the BCT has not finalized nor approved the EE/CA by the BCT.

- **Applicable or relevant and appropriate requirements (ARARs).** Identify Federal and State ARARs. If not, provide explanation why the Navy did not identify or considered these ARARs (both Federal and State).
- **Estimated costs.** Provide detailed information on the cost of the selected alternative.
- **Schedule.** Provide detailed information regarding the time needed to perform the removal action.

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

Sincerely,



Vazmine J. Yan-Deffler
Remedial Project Manager
Federal Facilities Section

cc: Jeff Thornburg, MDE
Steven Richard, GSA