Section : 12.01
Site 20903-5640 (White Oak)
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00379

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

February 14, 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 Final Post Removal Action Report for Sites 8, 9, and 11 for the Former Naval Surface Warfare Center

Dear Mr. Legg:

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

GENERAL COMMENTS

1. The removal action objective, as stated on page 1-4 of Section 1.2, is to protect regional groundwater and human health and the environment. The preliminary risk assessment has been removed from this report, so the removal action objective is not clarified. However, the criteria used to cease excavating and begin backfilling is modified to include confirmation sampling and analysis.

   The text details whether the concentrations of parameters of interest in the soil exceeded the preliminary remediation goals (PRGs). If the PRGs are not met, the text only states if the Region III RBCs or White Oak specific background values were attained. Further justification for not continuing the excavation should have been provided. Additionally, the source of background values is also unclear since the Background Investigation was only completed in October. The text should provide the proper justification as previously discussed, including the three alternates.

2. The designation of "R" and "RR" on Figures 2-1 and 2-2 remains unclear. The sample identification names are not explicitly defined in the text.

   The sample locations appear to be properly identified on the figures, but the scale of the figures is not increased. It remains unclear how resampled locations could only differ in elevation if resampling was initiated after increasing both the depth and lateral extent of excavation.

3. The text still does not discuss quality assurance/quality control. The QA/QC objectives and procedures for the confirmatory samples should be addressed in the text.

4. The year should be provided for completeness and clarity since numerous years have lapsed since the original sampling event. However, the date continues to be referenced without the relevant year.

5. The original recommendations were complete and justified. However, the current recommendations seem inadequate due to their brevity. It is unclear why the recommendations have been condensed.

6. The issue of requiring stabilization or microencapsulation prior to disposal of excavation wastes is not addressed in this report.

   The disposal location of both the hazardous and non-hazardous waste is included in Section 2.1.4 for Site 8. No locations are provided for Site 9 and Site 11, but the same locations are assumed. Only the total and site specific amounts of non-hazardous solid wastes are included in the report. The quantity of hazardous waste generated, or a statement that none was generated, is not addressed in the text.

7. Explicit excavation dimensions and justification of sample sitings are not provided.

SPECIFIC COMMENTS

8. An additional figure was not added to delineate the initial, secondary, and tertiary excavations. According to the narrative description, the extent of excavation covers an area 17 feet by 21 feet. This remains in disagreement with Figure 2-1. The method of expansion listed in the text also remains unclear.

9. *Section 2.1, page 2-2 Paragraph 1.* It is stated in sentence 2 of this paragraph that composite sample DP01-08-01 was analyzed for metals and cyanide. According to Table 3-2, this sample was not analyzed for cyanide. Additionally, composite sample DP01-08-02 was analyzed for metals, cyanide, VOCs and SVOCs. It should be noted that volatile and semivolatile analyses of composite samples may not be representative of site contamination due to mixing. This paragraph should be revised to accurately reflect which parameters were analyzed and include an explanation for the rationale behind the variance in parameters analyzed.

10. *Section 2.1, page 2-2 Paragraph 2.* This paragraph does not include the sample identification names for the secondary excavation confirmatory samples. The text should include the sample identification names for the 12 additional samples collected after the secondary excavation.

11. Analytical data from the analyzed tree are not provided or referenced in the RA report.

12. According to Figure 2-1, the initial round of samples from the excavation floor were collected at a depth of 8 feet, and second round samples were collected from a depth of 9 feet. The depth of the tertiary samples are omitted from Figure 2-1. The text states the secondary and tertiary depths as 10 and 12 feet, respectively. The discrepancy between the text and Figure 2-1 is not clarified.

13. The leaching well 9 excavation vicinity is designated as Site 9, Work Area A in the text. Figure 2-2, the area is identified as Site 9A. The site designation should be consistent with the text and figures.

14. The text states that the drain pipe leading from leaching well 9 to Building 339 was previously disconnected. This remains inadequate justification for excluding the drain pipe from excavation.

15. The dimensions of the additional excavation should be stated in the text.

16. The report should address the possibility of the unexcavated pipe as a continuing source of groundwater contamination. Due to the analysis of sample DL12-11-01 (where analyses indicated concentrations of arsenic, chromium, and thallium are in excess of PRGs), alternative methods to evaluate the extent of contamination along the pipeline should have been investigated.

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

Sincerely,

Yazmine J. Yap-Deffler

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

cc: Jeff Thornburg, MDE
Steven Richard, GSA