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NWIRP CALVERTON NY
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DEPARTMENT OF THE NAVY

NORTHERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
10 INDUSTRIAL HIGHWAY
MAIL STOP, #82
LESTER, PA 19113-2090

IN REPLY REFER TO
5090
Code 1821/JLC

FEB 06 1996

Ms. Carol Stein
Hazardous Waste Facilities Branch
U.S. EPA Region II
290 Broadway
New York, NY 10007-1866

Subj: INVESTIGATIVE DERIVED WASTES (IDW) FOR NWIRP CALVERTON, NY

Dear Ms. Stein:

Attached is a letter from the Navy's environmental contractor to myself which outlines plans to analyze, spread or dispose of the investigative derived wastes (IDW) which are currently being staged at the Naval Weapons Industrial Reserve Plant at Calverton, New York. These wastes were generated as a result of field activities associated with the RCRA Facility Assessment and the RCRA Facility Investigation, both of which were conducted during the past couple of years.

The letter addresses the need to spread or dispose of IDW such as plastic tanks, empty 55-gallon drums, drummed soil cuttings, drummed trash, and drummed oil residues. Table 1, which is attached to the letter, is an inventory of the drums containing IDW and consists of the drum identification number, contents, results of chemical testing that was done during RFA/RFI activities, and the proposed handling methods.

I would like to ask that you review the Navy's proposal for processing the IDW described above and return any comments that you may have to me no later than March 1, 1996. The Navy would like to conduct these activities during the early spring when the weather becomes more mild.

Similar requests for comments were also submitted to Mr. Jeff McCullough of the New York State Department of Environmental Conservation and to Mr. James Pim of the Suffolk County Health Department.

If you have any questions or need any further information, please give me a call at (610) 595-0567, extension 163.

Sincerely,

A handwritten signature in cursive script that reads "James L. Colter".

JAMES L. COLTER
Remedial Project Manager
By Direction of the
Commanding Officer

Enclosure

CF Braun Engineering Corporation

Foster Plaza VII
661 Andersen Drive
Pittsburgh, PA 15220-2745

(412) 921-7090
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C-49-02-6-021

February 2, 1996

Project Number 0206

Mr. Jim Colter (Code 1823)
Remedial Project Manager
Northern Division
Naval Facilities Engineering Command
10 Industrial Highway, MS#82
Lester, Pennsylvania 19113

Reference: Clean Contract No N62472-90-D-1298,
Contract Task Order No. 0138

Subject: RFA and RFI Residue Management
NWIRP Calverton, New York

Dear Mr. Colter:

The purpose of this letter to propose to the Navy for concurrence, plans for handling plastic tanks (750 to 2600 gallon), 55-gallon steel drums, drummed soils, and drummed oil residues currently being held at Site 2 - Fire Training Area. These drummed soils results from RFA and RFI field activities in 1994 and 1995. Because of other concurrent field activities, these residues can be cost-effectively handled in the spring of 1996. Specific plans are summarized below.

Plastic Tanks

There are 6 plastic tanks located at Site 2. These tanks were used during the RFA and RFI field investigation for storing drilling fluids, decontamination waters, and pump-test waters. The tanks range in size from 750 gallons to 2600 gallons at Site 2. Of the six tanks, four tanks are in relatively good shape and should be usable for similar future activities. The remaining two tanks have cracks in them which renders them no longer usable. CF Braun is proposing to cut the two tanks into smaller pieces and dispose of them as non-hazardous waste. The other four tanks would remain on site for future use.



Mr. Jim Colter

February 2, 1996

CTO 0138 - Page 2

55-Gallon Drums (Proposed to be emptied)

There are approximately 50 55-gallon steel drums located at Site 2. Most of them currently contain drill cuttings from the RFA and RFI activities. After the soils have been removed from the majority of drums as described below, CF Braun is proposing to visually confirm that the drums are empty, crush, and then dispose of most of them as non-hazardous waste.

Drummed Soils

There are approximately 39 drums at the site that contain drill cuttings and trash from RFA/RFI investigations, as well as several drums of drill cuttings filled during the installation of air injection and extraction wells. The total estimated volume of the drummed soils is approximately 10 cubic yards. The only soils drummed during the investigations were those which were noted to be stained (organics) and/or were measured to have an elevated OVA reading. Therefore, these soils should represent the more contaminated soils from each site. However, based on the results of the RFA and RFI investigation, with the exception of samples collected at Site 1 - Northeast Pond Disposal Area, none of the soils would be classifiable as hazardous. Note that the Site 1 soils may be classifiable as hazardous because of leachable chromium. It is uncertain if any of the drums contain residue from Site 1, although the drums with markings which could not be identified are possibly from this site (Drums #s 17, 19, 20, and 25 - See Table 1).

A conservative review of the RFA and RFI results indicate that all of the drummed soils, except for those from Site 1, would not be classifiable as a hazardous waste and would be expected to contain only petroleum hydrocarbons, chlorinated VOCs, SVOCs (mostly petroleum-based), and/or potentially low concentrations of PCB (less than 10 mg/kg). These constituents were also found at Site 2 similar concentrations. In addition, volatilization during handling and biodegradation of these constituents since generation should have further reduced chemical concentrations. CF Braun's proposal for handling the drum contents is summarized as follows, with additional details for individual drums presented in Table 1

- Prepare an area (approximately 20 feet by 20 feet) to spread the soils. This area should be near the southern edge of the fire training ring. The preparation would consist of leveling the area and removing residual vegetation. The area would not be in an active surface runoff drainage path.
- Confirm the identity of each drum by markings, and then check the drum contents for staining and OVA readings. Drums originating from the Northeast Pond Disposal Area (NP or similar labeling) would not be spread, but would be sampled for TCLP chromium. This drum (s) and other drums indicated in Table 1 for additional testing would not be spread.

 Mr. Jim Colter
February 2, 1996
CTO 0138 - Page 3

- The drum contents indicated in Table 1 would be spread at the designated area, in shallow lifts.
- After all of the drum contents have been spread, one sample of the pile would be collected for VOC testing. Also, a composite sample, from five locations, would be collected for total petroleum hydrocarbon analysis. The analytical data will be used to document the quality of soils spread.

Drummed Trash

The drummed trash at the site consists of PPE, tyveks, and miscellaneous debris. CF Braun is proposing to re-bag the trash and place it in Grumman trash receptacles.

Drummed Oil

This drum contains a composite of floating oils from monitoring well sample activities. Because of the concentrated nature of the liquid, the drum was also placed in an overpak. VOCs, SVOCs, PCBs, and pesticides from each of the sites would be expected to be present in the oils. CF Braun is proposing to test the contents for PCBs, flash point, and TOX. Free product - analytical data from the Site Investigation can be used to supplement this testing. Incineration of the drum and contents is the likely fate of this material. Note, CF Braun is not proposing to dispose of this oil under existing funding.

If have any questions or require additional information, please call me at (412) 921-8375

Sincerely



David D. Brayack, P.E.
Project Manager

/DDB

cc: Mr. R. Boucher (Navy) w/o attachment
Mr. D. Rule (Navy) w/o attachment
Mr. J. Trepanowski (HNUS)
Mr. D. Hutson (HNUS)
Mr. J. Farrell (HNUS) w/o attachment

TABLE 1

RFA AND RFI RESIDUE MANAGEMENT
NWIRP CALVERTON, NEW YORK

Drum #	Sample Location	Type of Sample (1)	C-VOC Results	NC-VOC Results	S-VOC Results	PCB Results	Metals - background	Metals - hazardous	Comments/Potential Fate
1	CP-SB09, CP-SB10, CP-SB11	Soil	ND	843	NA	NA	NA	NA	VOCs primarily acetone Spread at Site 2.
2	CLO8001-SB22	Soil	ND	ND	NA	NA	---	---	Spread at Site 2
3	CLO613-SB20, CLO8001-SB21 & SB22	Soil	ND	ND	NA	NA	---	---	Spread at Site 2
4	CLO611-SB18 & CLO611-SB19	Soil	ND	ND	NA	NA	---	---	Spread at Site 2
5	CLO617-SB31 & CLO617-SB32	Soil	ND	0.7	NA	NA	---	---	Spread at Site 2.
6	CLO617-SB29 & CLO617-SB30	Soil	ND	2	NA	NA	---	---	Spread at Site 2
7	CLO703-SB27 & CLO703-SB28	Soil	ND	2	NA	NA	---	---	Spread at Site 2
8	CLO612-SB23 & CLO612-SB24			3	NA	NA	---	---	Spread at Site 2
9	CLO703-SB25 & CLO703-SB26	Soil	ND	5	NA	NA	---	---	Spread at Site 2
10	ECM-SB08	Soil	ND	2	NA	NA	NA	NA	Spread at Site 2
11	FTA-??	Soil	---	---	---	---	---	---	Site 2 soils, spread at Site 2
12	FTA-??	Soil	---	---	---	---	---	---	Site 2 soils, spread at Site 2
13	FD-TW01	Groundwater	4.84	ND	NA	NA	NA	NA	Spread at Site 2
		Soil Gas	ND	ND	NA	NA	NA	NA	
14	FD-TW01	Groundwater	4.84	ND	NA	NA	NA	NA	Spread at Site 2
		Soil Gas	ND	ND	NA	NA	NA	NA	
15	FC-TW12	Groundwater	26	1486.6	NA	NA	NA	NA	Test for VOCs and TPH

TABLE 1

RFA AND RFI RESIDUE MANAGEMENT
NWIRP CALVERTON, NEW YORK

Drum #	Sample Location	Type of Sample (1)	C-VOC Results	NC-VOC Results	S-VOC Results	PCB Results	Metals - background	Metals - hazardous	Comments/Potential Fate
1	CP-SB09, CP-SB10, CP-SB11	Soil	ND	843	NA	NA	NA	NA	VOCs primarily acetone. Spread at Site 2.
2	CLO8001-SB22	Soil	ND	ND	NA	NA	---	---	Spread at Site 2.
3	CLO613-SB20, CLO8001-SB21 & SB22	Soil	ND	ND	NA	NA	---	---	Spread at Site 2.
4	CLO611-SB18 & CLO611-SB19	Soil	ND	ND	NA	NA	---	---	Spread at Site 2
5	CLO617-SB31 & CLO617-SB32	Soil	ND	07	NA	NA	---	---	Spread at Site 2
6	CLO617-SB29 & CLO617-SB30	Soil	ND	2	NA	NA	---	---	Spread at Site 2
7	CLO703-SB27 & CLO703-SB28	Soil	ND	2	NA	NA	---	---	Spread at Site 2
8	CLO612-SB23 & CLO612-SB24			3	NA	NA	---	---	Spread at Site 2
9	CLO703-SB25 & CLO703-SB26	Soil	ND	5	NA	NA	---	---	Spread at Site 2
10	ECM-SB08	Soil	ND	2	NA	NA	NA	NA	Spread at Site 2
11	FTA-??	Soil	---	---	---	---	---	---	Site 2 soils, spread at Site 2
12	FTA-??	Soil	---	---	---	---	---	---	Site 2 soils, spread at Site 2
13	FD-TW01	Groundwater	4.84	ND	NA	NA	NA	NA	Spread at Site 2
		Soil Gas	ND	ND	NA	NA	NA	NA	
14	FD-TW01	Groundwater	4.84	ND	NA	NA	NA	NA	Spread at Site 2
		Soil Gas	ND	ND	NA	NA	NA	NA	
15	FC-TW12	Groundwater	26	1486.6	NA	NA	NA	NA	Test for VOCs and TPH.

TABLE 1 (Continued)
RFA AND RFI RESIDUE MANAGEMENT - Page 2

Drum #	Sample Location	Type of Sample (1)	C-VOC Results	NC-VOC Results	S-VOC Results	PCB Results	Metals - background	Metals - hazardous	Comments/Potential Fate
		Soil Gas	24.6	206.5	NA	NA	NA	NA	
16	FTA-??	FC-SB04	ND	18800	65360	NA	ND	ND	
		---	---	---	---	---	---	---	Spread at Site 2
17	? (Faded Print)	---	---	---	---	---	---	---	Check contents to determine origin.
18	Drum for Trash								Bag and place in Grumman dumpster.
19	? (Faded Print)								Check contents to determine origin
20	? (Faded Print)								Check contents to determine origin
21	FD-TW01	Groundwater	4.84	ND	NA	NA	NA	NA	Spread at Site 2
		Soil Gas	ND	ND	NA	NA	NA	NA	
22	Lithological Samples								Spread samples at Site 2, except Site 1 soils (NEPDA) Bottles to trash.
23	Lithological Samples								Spread samples at Site 2, except Site 1 soils (NEPDA) Bottles to trash
24	FC-TW05	Groundwater	1.48	4.2	NA	NA	NA	NA	Spread at Site 2
		Soil Gas	ND	ND	NA	NA	NA	NA	
25	? (Faded Print)								Check contents to determine origin
26	FC-TW08	Groundwater	9.54	ND	NA	NA	NA	NA	Spread at Site 2
		Soil Gas	6.5	1.8	NA	NA	NA	NA	
27	FC-TW08 & FC-TW09	Groundwater	9.54	2395.1	NA	NA	NA	NA	Test for VOCs and TPH
		Soil Gas	1408.5	165.6	NA	NA	NA	NA	
28	FC-TW09	Groundwater	ND	2395.1	NA	NA	NA	NA	Test for VOCs and TPH
		Soil Gas	1402	163.8	NA	NA	NA	NA	

TABLE 1 (Continued)
RFA AND RFI RESIDUE MANAGEMENT - Page 3

Drum #	Sample Location	Type of Sample (1)	C-VOC Results	NC-VOC Results	S-VOC Results	PCB Results	Metals - background	Metals - hazardous	Comments/Potential Fate
29	FC-TW04	Groundwater	4.30	505	NA	NA	NA	NA	Test for VOCs and TPH
		Soil Gas	ND	ND	NA	NA	NA	NA	
30	FC-TW10	Groundwater	3.86	307.6	NA	NA	NA	NA	Spread at Site 2.
		Soil Gas	ND	13.6	NA	NA	NA	NA	
31	FC-TW05 & FC-TW06	Groundwater	4.41	4.2	NA	NA	NA	NA	Spread at Site 2
		Soil Gas	ND	ND	NA	NA	NA	NA	
32	Slightly empty drum (1/4 full)	---	---	---	---	---	---	---	Bentonite clay, spread at Site 2
33	One drum in yellow poly-pack	---	---	---	---	---	---	---	Composite oil from three sites. Tests for PCBs, flashpoint, and TOX
34	FT-TW15	Groundwater	2.40	ND	NA	NA	NA	NA	Spread at Site 2
		Soil Gas	ND	ND	NA	NA	NA	NA	
35	FT-TW15	Groundwater	2.40	ND	NA	NA	NA	NA	Spread at Site 2.
		Soil Gas	ND	ND	NA	NA	NA	NA	
36-39	Trash - 4 drums	---	---	---	---	---	---	---	Bag and place in Grumman dumpster

?? Numbers are not legible CP Coal Pile Storage Area CLO Cesspools/leachfields
 ECM ECM Area FTA Fire Training Area FD Fuel Depot
 FC Fuel Calibration ND None detected NA Not Analyzed
 --- No data C-VOC Chlorinated Volatile Organic Compounds
 NC-VOC Non-chlorinated VOCs TOX Total organic Halogens
 Soil gas units ug/l
 Soil data units - VOCs: ug/kg
 - SVOCs: ug/kg
 - PCBs: mg/kg
 - Metals mg/kg

Spread at Site 2 indicates that soils will be spread in an area identified as being contaminated at Site 2
 (1) Type of sample indicates media for analytical results presented. All drum contents are soils unless otherwise noted