03.01-12/20/94-02446

Halliburton NUS CORPORATION

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C-49-12-4-190

December 20, 1994

Project Number 4435

Commander
LANTNAVFACENGCOM
1510 Gilbert Street
Norfolk, VA 23511-2699

Attention: Mr. Gary McSmith, Mail Code 1823

Reference: CLEAN Contract N62472-90-D-1298
Contract Task Order No. 191

Subject: MCAS Cherry Point, North Carolina
OU-1, Site 16 Debris Piles Remediation
Response to Comments on Draft Work Plan

Dear Mr. McSmith:

Enclosed is the Final Work Plan for the above reference CTO, which has been revised based on comments provided by the Navy and the USEPA. In addition to these changes, please note that the document has been revised to reflect the actual work that was performed for the pre-design investigation. At your direction and due to the minor changes that were necessitated by the review, Halliburton NUS proceeded with field work using the draft plan and made the necessary procedural changes while in the field. Final analytical results will be included in the design documents and are not available at the present.

Also, find attached Halliburton NUS' response to comments. If you have any questions on these items, please call me at 412-921-7169.

Very truly yours,

/Randall Elder

For Stephen W. Hughes, P.E.
Project Manager

SWH/JRE/pm
Enclosures
Attachment
cc: Mr. Roger Boucher, NORTHDIV (letter only)
Ms. Renee Henderson, MCAS Cherry Point
Ms. Linda Raynor, MCAS Cherry Point
Ms. Gena Townsend, EPA
Mr. John Trepanowski, Halliburton NUS
Ms. Debra Wroblewski, Halliburton NUS (letter only)
Mr. Randy Elder, Halliburton NUS
File 4435

ATTACHMENT
MCAS CHERRY POINT, NORTH CAROLINA
CONTRACT TASK ORDER NO. 191
RESPONSES TO DRAFT WORK PLAN COMMENTS

Comments by LANTDIV and Responses by Halliburton NUS:

Comment 1:

Page A.1-1, Section 1.2: Typo, 2 periods after first sentence.

Response:

Correction has been made.

Comment 2:

Page A.1-1, Section 1.2: Expect site has expanded to 20 acres with new discoveries made during TDM 10 and 16 and this debris site. Please confirm Site 16 size.

Response:

Correction has been made.

Comment 3:

Page 1.1-2: Typo, change FIR to RFI.

Response:

Correction has been made.

Comment 4:

Page A.1-2: Some sampling was conducted during CTO-161, please mention.

Response:

Correction has been made.

Comment 5:

Page A.2-1: Will any soil samples be analyzed for asbestos? Will this be a factor during design/construction that should be settled now? I think it should.

Response:

Six soil samples were collected for analysis of asbestos content. The locations of these samples is shown on Figure 3-1 in the Field Sampling Plan.

Comment 6:

Page A.3-1, Section 3.1: Please indicate the approximate wetlands delineation on the detailed topo map of the site. Please make sure the topo map of the site is to scale and indicates the locations of the major Correction has been made.
items of debris.

Response:

The requested information has been included on Figures 3-1 and 3-2.

Comment 7:

Page A.3-2, Figure 3-1: At least one well and possibly some soil samples were taken during CTO 161. Please make sure this figure is updated.

Response:

The figures have been revised to include the soil sampling locations (asbestos) and the monitoring well, which was installed during the Operable Unit 1 investigation.

Comment 8:

Page A.3-3, fifth bullet: Typo, please correct the spelling of southern. Also, please delete "where petroleum odors were detected during a site walk" because those odors were rightly attributed to diesel fumes from nearby truck traffic and should have no relation to sample location. I agree that 3 samples from the southern portion of the site are warranted.

Response:

Correction has been made.

Comment 9:

Page A.3-3: Field locate all samples in areas that indicate staining or where drums or broken vessels are located.

Response:

Correction has been made.

Comment 10:

Page A.3-4: Please use very deep stakes or rebar to mark sample locations. Please install at least 2 feet of buried depth. Lost sample locations are very troublesome.

Response:

Correction has been made.

Comment 11:

Page A.6-1, Section 6.0: Show that COC is an abbreviation of Chain of Custody (COC).

Response:

Correction has been made.

Comment 12:

Page B.3-2: Why can't Asbestos method be specified before lab selection? Your proposal mentions EPA-6001M4-82-020, what are you considering now?

Response:

The EPA method stated was used. Corrections have been made to the method references.

Comment 13:

Page B.4-1: Please list Randy Elder as key Halliburton NUS personnel.

Response:

Correction has been made.

Comment 14:

Page B.5-5, Section 5.9: All bottle ware will be received new on the site for this job and returned to exactly the same lab that supplied it for this job.

Response:

Correction has been made.

NOTE: Sample analysis shall be CLP unmodified. Petroleum Hydrocarbons (TPH) sampling and analysis in soils will be conducted for low, medium, and high petroleum hydrocarbons in accordance with EPA 8015, 9071, 3550, and 5030. Detection limits for petroleum hydrocarbons shall be less than or equal to 10 ppm for light, 40 ppm for medium, and 250 ppm for oil and grease. In the event that it is impossible to meet these detection limits of petroleum for any samples, then an explanation will be included by the analyzing laboratory on the lab reports and also the report text will specifically discuss the conditions that made it possible to meet these detection limits. The same reporting procedures will be included in the text and on the lab reports if any contract Required Quantitation Limits (CRQLs) are not met by detection limits of any compound in any matrix. The intent is to meet these limits for all compounds at all times. If these limits absolutely cannot be met, it is the burden of the contractor and laboratory to prove and establish the conditions that absolutely prevent compliance. Please make whatever changes to the document that are necessary to achieve this end.

Response:

The laboratory procurement specifications were written to achieve the stated detection limits.

Comments by NC Superfund Section and Responses by Halliburton NUS:

Field Sampling Plan (Appendix A):

Comment 1:

Section 1.3: Please supply descriptions for the acronyms IRRI and FIR.

Response:

Correction has been made.

Comment 2:

Section 3.2: During the site visit on October 28, 1994, we noticed that a large tree in the vicinity of the 2 large storage tanks was definitely exhibiting signs of being "stressed," and we discussed that this would be a good location to collect a soil sample. Is this one of the planned sampling locations, as described in the fourth bulleted item on page A.3-3? The 2 large storage tanks had a valve on the end of each tank, and at least one of the tanks also had a valve on the side of the tank. Are the three soil samples to be collected, as described in the second bulleted item on page A.3-3, located beneath each of these three valves?

Response:

The samples were collected as discussed. The locations are shown on Figure 3-1 in the Field Sampling Plan.

Comment 3:

Pages A.4-2 and A.4-3: The sample designation description in the second paragraph on page A.4-2 ("for example, for surface soil samples this will be 0010 indicating the sample was taken from 0.0 to 1.0 feet.") does not coincide with the example given at the bottom of page A.4-3 ("Soil sample collected at a depth 0-1' from second surface soil sampling location would be labeled: 16-SO-2-0001"). Which is the correct designation?

Response:

Correction has been made to Page A.4-2

Quality Assurance Project Plan (Appendix B):

Comment 1:

Table 3-2: The laboratory analysis method listed for TPH in Table 3-2 is incorrect and does not correspond with the method listed in Table 3-1. Note: The analytical results for TPH analyses on soil samples must be reported on a dry weight basis with reportable concentrations of 10 ppm for Method 5030/8015, 40 ppm for Method 3550/8015, and 250 ppm for Oil and Grease Method 9071.

Response:

Correction has been made. The laboratory procurement specifications were written to achieve the stated detection limits.

Comment 2:

Section 6.5, Sample Equipment and Protocols: "The sampling equipment and protocols to be used are presented in Appendix B of the Work Plan." Since this is Appendix B, it is unclear where sample equipment and protocols is discussed. Perhaps this should be Appendix D?

Response:

This has been revised to read "Appendix D".

Health and Safety Plan (Appendix C):

Comment 1:

Page C.6-2, Section 6.1.2, first paragraph: IF the field technician is not knowledgeable and comfortable in the use and interpretation of direct reading field instruments, they should not be doing this type of work. Instrument selection may be based on factors such as (but not limited to): 1) which instrument has the more sensitive response to the chemicals encountered and 2) which instrument is more reliable under the environmental conditions encountered, such as temperature extremes or excessive humidity?

Response:

All Halliburton NUS personnel who have a reason to use the air monitoring equipment are trained and are comfortable in both the selection of the proper equipment and its use.

Comment 2:

Page C.6-7: What type of respiratory protection will be provided the personnel who are assigned to use the colormetric tubes to determine presence of vinyl chloride and/or methylene chloride?

Response:

The selection of PPE, including respiratory protection, will follow the Halliburton NUS standard practices that are summarized in Sections 6 and 7 of the Health and Safety Plan.