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Subject: re: Site 13
Date: Thursday, May 29, 1997 16:27:41 EDT
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Phil,

Several of these comments will require clarification from Foster Wheeler, especially waste characterization, sampling and documentation issues for EPA Comment Nos. 3, 16, 17, and 23. It is important that we get clarification as soon as possible so that we can get this final report issued. Most of this is in relation to what sampling/waste characterization was done and what was not.

Clearly, we can not change what has already been done on this matter, but maybe can offer some rationale.

With regard to the benzene / D018 classification, I believe that benzene was "checked off" on the documentation because of the semi-volatile hits of 1,2- and 1,3-dichlorobenzene and 1,2,4-trichlorobenzene. Christine is correct that no VOC analysis was performed here. However, these compounds, which are included in semi-volatile analysis, are on the borderline between semi-volatile and volatile organics.

We are currently working with Foster Wheeler on the manifest issue to make certain that the Laidlaw/AmRec documentation should be removed from the pack. We were given the entire pack together, but it appears that these manifests may belong to UST removal work (possibly UST 11-22). We have told Christine already that we were working with Foster Wheeler on this and would remove the documentation if it does not belong.

The word "pesticide" will be removed from the tables as applicable (EPA Comment 6).

Her e-mail incorrectly states that the catch basin liquid failed for TCLP pesticides. Pesticides were detected in the sample, but TCLP analysis was not performed (and therefore could not fail!).

The narrative provided in response to EPA Comment No. 17 states that the storm drain line sediment was sampled for PCB only. The narrative also clearly states in the final paragraph, that the sediments generated from the cleaning of the sanitary sewer line (not the sediments from the storm drain line cleaning) were analyzed for PCB, TCLP metals, TPH, and flashpoint. Perhaps she is getting confused with the several different kinds of sediments generated by various activities associated with the removal action. We don't plan to change anything on this one.

As always, please call me or send an e-mail if you have comments or questions.

Linda

CHRISTINE WILLIAMS <WILLIAMS.CHRISTINE@EPAMAIL.EPA.GOV> Wrote:

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Comments:

EPA is certainly reviewing thoroughly.

Phil

----- [Original Message]

The Navy has not clarified the waste disposal issues EPA first brought up in our May 5, 1997 comment letter on the Draft Site 13 Removal Action Closeout Report. This letter re-iterates the questions posed to your sub-contractor, Stone & Webster, on May 27, 1997. Please review the following responses and provide clarification.

EPA Comment No. 3: This comment questioned the handling and

characterization of the liquid generated as a result of the storm drain

cleaning. Navy provided clarification as to the handling of the liquid. The liquid was not discharged down the sanitary sewer as

suspected, but was containerized and sent offsite for disposal. The Navy states that the waste stream was "properly disposed" offsite.

However, several issues still remain with respect to the proper characterization of this waste stream. The initial liquid removed from

the catch basins of the storm sewer was sent offsite hazardous as a result of the pesticide "endrin". It appears that the liquid generated as a result of the storm sewer cleaning was not analyzed for pesticides

during waste characterization. According to the Navy response in EPA

Comment 16, the storm drain line cleaning water was analyzed for PCB,

TPH, RCRA metals, and ignitability; essentially ignoring the results of

the catch basin liquid sampling. Additionally, the report (Table 1) indicates that this waste stream was disposed at United Oil Recovery, Inc. After looking at the

manifests, the waste was characterized as

"RQ Waste Flammable liquid, NOS" and assigned the RCRA waste codes DQ01

(ignitable) and D018 (benzene).

Neither the Navy's response to Comment

16 or Table 7 indicate that VOC analysis was performed on this waste stream. For clarification as to why this waste stream was classified as RCRA "D018" should be provided. Additionally, explanation as to why this waste stream was not analyzed for pesticides

based on the catch basin results should be provided.

EPA Comment 6. EPA requested summaries of the waste characterization

data for the waste streams generated as a result of this removal effort.

The Navy developed additional tables summarizing the results of waste

characterization efforts for the specific waste streams. The tables break down the results by the analysis/parameter performed.

However,

the tables are, in some instances, misleading. In the

analysis/parameter column, PCB results are shown under the analysis/parameter category as Pesticides/PCBs which is misleading since pesticides were not analyzed for several of the waste streams.

For the waste streams where PCBs were analyzed and no pesticides, the word "pesticides" should be removed from the analysis/parameter column.

EPA Comment 16 and 17. EPA questioned the selection of analyses performed on some of the waste streams and requested a summary of the

analyses performed. The Navy provided in their response a summary of

the analyses performed on each waste stream. With respect to the information provided by the Navy several concerns still remain.

It is unclear why different parameters were utilized for different waste streams and different matrices. For example the catch

basin liquid was sampled for pesticides, and in fact, was determined to be hazardous as a result of endrin; yet the catch basin sediments were not sampled for TCLP pesticides.

- As stated above, the catch basin liquids were analyzed for several different analyses, one of which was for pesticides which characterized the catch basin liquid as hazardous. However, the liquid generated as a result of the storm drain line cleaning was not analyzed for pesticides.

- The Navy response to comment 16 indicates that fac. tank sediments were analyzed for PCBs only, while the narrative provided by the Navy to EPA comment 17 indicates sediments from the storm drain line cleaning which were placed in the fac. tanks were analyzed for PCB, TCLP metals, TPH and flashpoint. This discrepancy should be resolved. There should be a minimum of two sediment samples, one for the sediments generated from the dewatering of the excavation and one from the storm drain line cleaning if the waste sediments were not consolidated. In any event, based on the analysis of the catch basin liquid sample failing for TCLP pesticides, the sediment from the storm drain line cleaning should have also been analyzed for TCLP pesticides.

EPA Comment 23. EPA requested clarification for several items of hazardous waste tracking documentation found in Appendix B of the report. Specifically, Appendix B contains Massachusetts DEP Material Shipping Records and Logs which indicate waste material being sent to Laidlaw waste systems inc. and American Reclamation Corporation for disposal. Neither of these two facilities are listed in Table 1 of the report which documents receiving facilities for waste generated for this removal effort. If these facilities were utilized as part of this removal effort they should be included in Table 1 documenting the specific waste stream which