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TRANSMITTAL LETTER FOR THE U S NAVY COMMENTS ON FINAL WORK PLAN NWS  
EARLE NJ  
12/7/1995  
FOSTER WHEELER ENVIRONMENTAL CORPORATION



## FOSTER WHEELER ENVIRONMENTAL CORPORATION

File #: 1284.0002.95.0149

**TO:** Commanding Officer  
Northern Division  
Naval Facilities Engineering Command  
10 Industrial Highway, Mail Stop #82  
Lester, PA 19113  
ATTN: Code 402A (P. Briegel)

**FROM:** John F. Gorgol, P.E. *John F. Gorgol*  
Senior Project Engineer/Manager

**DATE:** December 7, 1995

**SUBJECT:** US NAVY CONTRACT NO. N62472-94-D-0398  
DELIVERY ORDER #0002 - PHILADELPHIA NAVAL BASE  
FINALIZATION OF WORK PLAN FOR SWMU M-20 PISTOL RANGE (TASK 3)

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Following are responses to the Navy's written comments received from Northdiv on November 20, 1995 and December 4, 1995, as well as comments received from the ROICC office received on December 5, 1995. This letter constitutes the Final Work Plan for this task.

1. **COMMENT:** If confirmatory sampling indicates contamination above remedial goals, do not continue excavation beyond the contractually agreed to volume. Provide analytical results to the Navy (G. Cancila and P. Briegel) and await further direction. Budgetary limits or other considerations may preclude continuance of remedial action.

**RESPONSE:** This comment is noted and will be complied with during work at the Pistol Range.

2. **COMMENT:** Describe the final disposition of any wastewater generated on-site.

**RESPONSE:** Any wastewater generated on-site will be drummed, sampled and off-site disposed. The drums will be stored within the East Bay of Building 56 within the temporary hazardous waste storage area for less than 60 days. This area is currently being used as a temporary hazardous waste storage area for wastes generated during the lead paint abatement activities.

3. **COMMENT:** Site is "SWMU M-20" not "SWMU-20".

**RESPONSE:** This correction will be made in all future references to the Pistol Range.

December 8, 1995

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4. **COMMENT:** During the initial investigation by EA Engineering, prior to the samples being taken, they were sieved to remove intact lead fragments prior to analyses. The confirmatory samples do not include sieving. Recommend samples be sieved and if fragments remain, continue excavation. If after sieving no lead fragments remain, confirmatory samples could be taken.

**RESPONSE:** This comment will be implemented using a No. 4 sieve (~2mm mesh); however, excavation above the contractually agreed to volume will not be performed without further Navy direction per Comment #1 above.

5. **COMMENT:** Page 3 - Is this "Tall Fescue" in lieu of "Fall Fescue"?

**RESPONSE:** The grass type shall be "Tall Fescue".

6. **COMMENT:** Attachment 1, Page 1, Item 6 - Ensure stainless steel pan is used.

**RESPONSE:** This comment will be implemented as stated.

7. **COMMENT:** Attachment 1, Page 1, Item 8 - Chill to 4 degrees C with ice.

**RESPONSE:** This comment will be implemented as stated.

8. **COMMENT:** Attachment 1, Page 2, Item 3 - Use nitric acid (HNO<sub>3</sub>).

**RESPONSE:** This comment will be implemented as stated.

9. **COMMENT:** Note that painted surfaces may contain lead-based paint.

**RESPONSE:** Health and safety measures will be implemented to address the potential for worker exposure to lead from painted surfaces. The presence of lead-based paint will not change the waste classification of the demolition debris (residual waste) from the baffles. In addition, the presence of residual paint on the steel has been confirmed to be acceptable to the iron recycler.

10. **COMMENT:** The access gate shown on Exhibit 3-1 is controlled by the Caretaker Site Office (CSO) located in Building 1 at the PNSY. For access to the site, coordinate with the ROICC inspector.

**RESPONSE:** This comment is noted and will be complied with during work at the Pistol Range.

JFG/eh  
RE/95-209

cc: A. Holcomb, FWENC  
Project File