

**FOSTER WHEELER ENVIRONMENTAL CORPORATION**

October 2, 1996

File #: 1284-0011-96-0713

Commanding Officer
Northern Division
Naval Facilities Engineering Command
10 Industrial Highway, Mail Stop #82
Lester, PA 19113
Attn.: Code 402A (C. Davis)

Subject: CONTRACT N62472-94-D-0398
DELIVERY ORDER NO. 0011 - MODIFICATION NO. 0002
POST-REMEDIATION LETTER REPORT
NAVAL EDUCATION AND TRAINING CENTER - SOIL STABILIZATION
AND REMOVAL

Dear Mr. Davis:

Foster Wheeler Environmental Corporation (Foster Wheeler Environmental) is pleased to provide you with this Post-Remediation Report associated with the soil stabilization and removal activities at Naval Education and Training Center - Melville, RI. This Post-Remediation Report has been prepared in accordance with the requirements of the above-referenced Delivery Order. The Report documents the following:

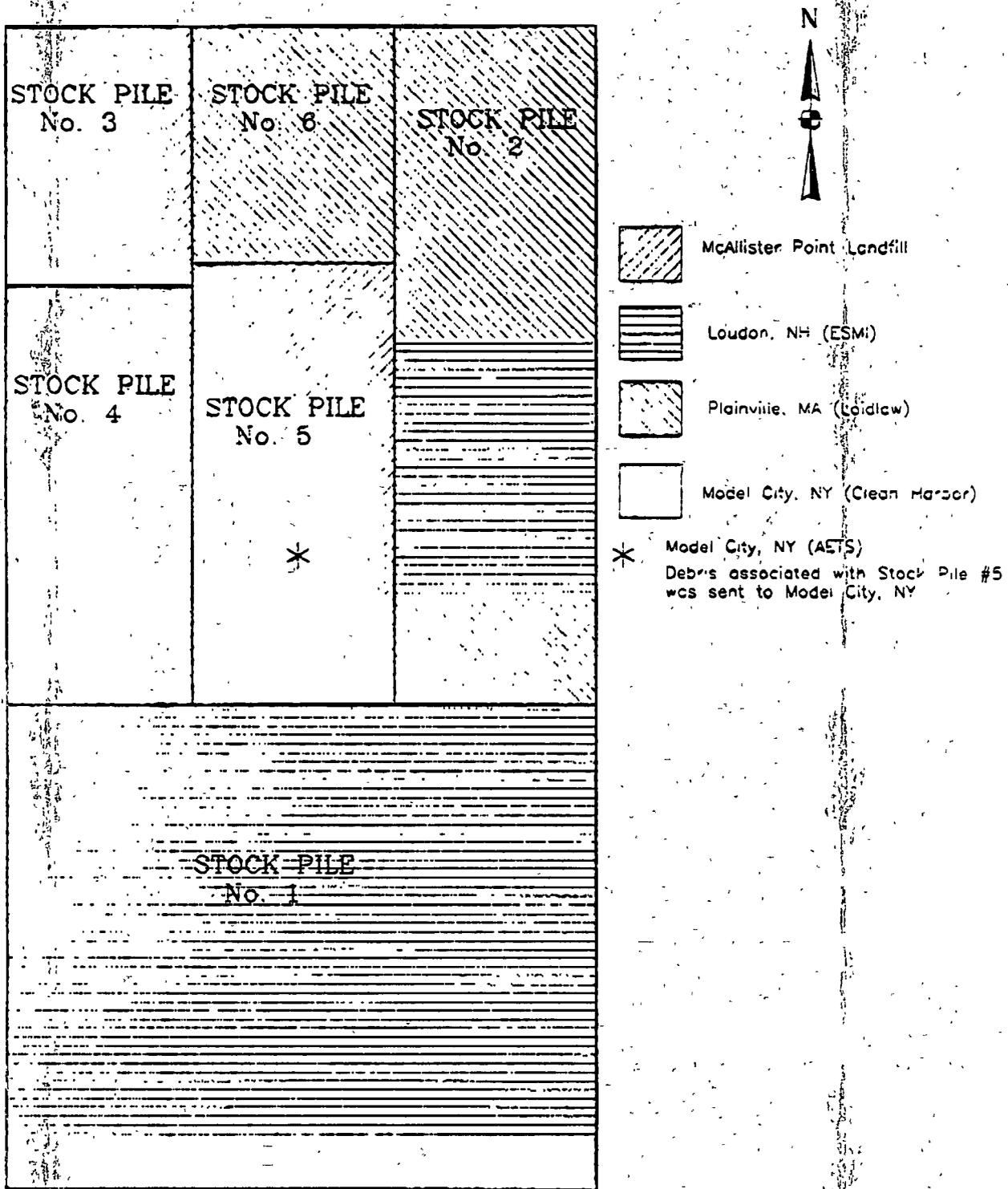
- Actions completed (including deviations from the Work Plan)
- Analytical results (submitted under separate cover)
- Photograph Log (Attachment #1)

MOBILIZATION

All work was performed in accordance with the Foster Wheeler Environmental Site Health and Safety Plan (SHSP) dated April 22, 1996 and the Work Plan except where noted.

Mobilization of craft personnel and site equipment began on May 28, 1996. Site personnel filled out pre-employment packages and attended a site health and safety orientation prior to the commencement of field activities. An equipment and personnel decontamination control point was established for site operations. Additionally, the stockpiled soil area was demarcated using orange construction fence to preclude the intrusion of unassociated site personnel. The soil stockpiles were removed in accordance with the Work Plan except where noted within the following sections.

Figure 1 provides a rough overview of the soil stockpiles prior to site operations. In addition, the respective disposal destinations are illustrated.



NOT TO SCALE

U.S. Navy RAC
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Figure 1
Melville Soil Stock Piles

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SOIL PILE NO. 4

In order to comply with Naval request and McAllister Point Landfill's schedule, Soil Pile No. 5 had to be removed first. However, Soil Pile No. 4 had to be removed in order to gain access to Soil Pile No. 5. In turn, from May 29, 1996 to May 30, 1996, site personnel loaded out Soil Pile No. 4 to McAllister Point Landfill. A total of twenty-seven (27) truck loads of material were removed (approximately 550 cubic yards).

SOIL PILE NO. 5

On May 30, 1996 the pugmill and screener arrived on site for the treatment of Soil Pile No. 5. After site personnel positioned the pugmill and screener on top of 60 mil liner, the crew constructed access ramps to the pugmill feed hopper, screener and to Soil Pile No. 5. At the start of the stabilization activities (June 3, 1996), unanticipated, excessive amounts of large debris were observed coming from the Soil Pile No. 5 screening operations (discussed below). The debris was stockpiled separately onto plastic and personnel continued to run the screened material through the pugmill. Afterwards, the pugmilled material was segregated into 100 cy piles for post-confirmatory sampling prior to hauling off site to McAllister Point Landfill.

On June 18, 1996 the pugmill was demobilized. A total of approximately 700 cy of screened soil were pugmilled successfully from Soil Pile No. 5 and were sent to McAllister Point Landfill.

DEBRIS PILES (Generated from Soil Pile No. 5)

Large pieces of debris (>3") were observed running through the pugmill operation from Soil Pile No. 5. Subsequently, four (4) paddles on the pugmill broke (June 5, 1996) and were repaired. A new screen (2") was installed (June 10, 1996) to prevent additional damage to the pugmill.

On June 12, 1996, personnel were ordered to evacuate the site by Naval Representatives due to a potential unexploded ordinance (UXO) found in the debris from Soil Pile No. 5. On June 15, 1996 a Foster Wheeler Environmental UXO specialist arrived to observe operations regarding Soil Pile No. 5 debris, i.e., to determine if any additional UXO were present within the unscreened portion of Soil Pile No. 5. No additional UXO were identified.

From July 24, 1996 to July 31, 1996, thirty-four truck loads of debris (approximately 500 cubic yards) associated with Soil Pile No. 5 were loaded and transported to Model City, NY as hazardous waste (due to lead and asbestos concentrations) for macroencapsulation.

SOIL PILE NO. 3

On June 26, 1996, site personnel loaded out Soil Pile No. 3 to McAllister Point Landfill. A total of eighteen (18) truck loads of material were removed (approximately 450 cubic yards).



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SOIL PILE NO. 6

On June 27, 1996, site personnel loaded out Soil Pile No. 6 to Laidlaw's Plainville, MA facility. A total of twenty-five (25) truck loads of material were removed (approximately 575 cubic yards) as non-hazardous material for use as soil cover. In addition, approximately 20 cy of Soil Pile No. 6 was used to construct a water retention berm along the west side of the soil piles to prevent material/water from migrating out of the exclusion zone. This additional material was loaded out to Laidlaw's Plainville, MA facility as non-hazardous material for use as soil cover on August 2, 1996.

SOIL PILE NO. 2

Due to the limited existing waste classification data and based on the size of Soil Pile No. 2, additional waste classification samples were collected from Soil Pile No. 2 as required by the disposal facility.

The first round of samples for Soil Pile No. 2 were collected during initial field survey on April 30, 1996. During the first round of sampling, five (5) discrete samples were collected from Soil Pile No. 2. The second round of samples were collected on June 26, 1996. During the second round of sampling, five (5) additional discrete waste classification samples were collected from Soil Pile No. 2. The third round of samples were collected on July 19, 1996. During the third round of sampling, Soil Pile No. 2 was divided into four sections and eight (8) discrete samples were collected from each section. The eight samples from each section were then composited by the laboratory and analyzed for waste classification parameters. The north half of Soil Pile No. 2 was approved for disposal at Laidlaw's Plainville, MA facility. A fourth round of samples were collected from the south half of Soil Pile No. 2 on August 1, 1996 for further waste classification by the disposal facility. During the fourth round of sampling, the remaining portion of Soil Pile No. 2 (south half) was divided into seven equal sections (approximately 100 cy each) and eight (8) discrete samples were collected from each section. The eight (8) samples were then composited by the laboratory and analyzed for waste classification parameters.

From July 30, 1996 to August 2, 1996, site personnel loaded out the North half of Soil Pile No. 2 to Laidlaw's Plainville, MA facility (approximately 775 cy). This material had TPH concentrations of <5,000 ppm and PCB concentrations of <2 ppm.

The south half of Soil Pile No. 2 was again divided into two sections (north and south) to be loaded out by two different disposal facilities based on the waste classification data. The north section (34 truck loads) was transported to ESMI's Loudon, NH thermal desorption facility on 8-20-96 and 8-21-96 as non-hazardous material. This material contained non-hazardous levels of waste oil and PCBs. ESMI was the most cost-effective treatment vendor for this material even though ESMI provided thermal desorption instead of landfilling capabilities. The south half (approximately 300



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cy) was approved for shipment to Laidlaw's Plainville, MA facility and contained TPH concentrations of <5,000 ppm and PCB concentrations of <2 ppm. The south section (15 truck loads) was transported to Laidlaw's Plainville, MA facility on 8-21-96.

SOIL PILE NO. 1

Due to the limited existing waste classification data based on the size of Soil Pile No. 1, additional waste classification sampling was required by the disposal facility.

The first round of samples for Soil Pile No. 1 were collected during initial field survey on April 30, 1996. During the first round of sampling, five (5) discrete samples were collected from Soil Pile No. 1. The second round of samples were collected on June 26, 1996. During the second round of sampling, Soil Pile No. 1 was divided into five (5) separate sections and, within each section, five (5) discrete samples were collected. The third round of samples were collected on July 22, 1996. During the third round of sampling, the south half of Soil Pile No. 1 was divided into fourteen separate sections (approximately 100 cy) and fourteen (14) discrete samples were collected from each section. These samples were then analyzed by the laboratory for waste classification parameters. The fourth round of samples were collected from Soil Pile No. 1 on August 2, 1996 for further waste classification for the disposal facility. During the fourth round of sampling, Soil Pile No. 1 was divided into eighteen equal sections (approximately 200 cy each) excluding the southern edge (approximately 200 cy) due to elevated PCB levels from previous samples. Within each of the eighteen sections, eight (8) discrete samples were collected which were composited by the laboratory and analyzed for waste classification parameters.

On July 23, 1996 and July 24, 1996 personnel loaded out seventeen (17) truck loads from the NW corner of Soil Pile No. 1 to McAllister Point Landfill (approximately 300 cy)

From August 16, 1996 to August 30, 1996 one hundred sixty six (166) truck loads of non-hazardous material was removed off site and sent to ESMI's Loudon, NH facility for thermal desorption.

From September 4, 1996 to September 11, 1996, forty-two (42) loads from the remaining south edge of Soil Pile No. 1 (975 tons) were transported to Model City, NY as PCB-contaminated waste.

DEMOBILIZATION

Demobilization consisted of returning all rental equipment to the appropriate vendors and providing all additional site supplies to the neighboring Foster Wheeler Environmental projects (Tank Farm No. 4 and McAllister Point Landfill). As part of the site restoration activities, the silt fence and hay bales were left in place along the western edge of the site. Grass seed and hay were then spread over the former soil stockpile area.



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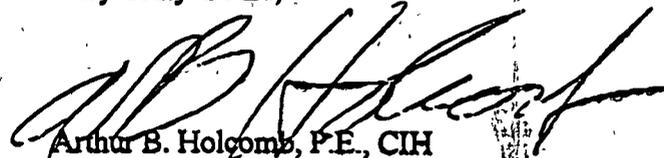
SUMMARY

Site stabilization and removal activities commenced on May 28, 1996 and were completed on September 12, 1996. The following is a total summary of the material removed from the site:

- McAllister Point Landfill: 1,700 cy of non-hazardous soil (landfilled)
- Laidlaw's Plainville, MA facility: 1,650 cy of non-hazardous soil (used as soil cover)
- ESMI's Loudon, NH facility: 3,800 cy of low-level PCB-contaminated soil (thermal desorption)
- CWM's Model City, NY facility: 975 tons of high-level PCB-contaminated soil (TSCA waste landfilled) and 500 cy of debris contaminated with lead and asbestos (macroencapsulated)

Please call me at (215) 702-4016 or the Delivery Order Manager, Dan Kopcow at (215) 702-4076 if you should have any questions or comments.

Very Truly Yours,



Arthur B. Holcomb, P.E., CIH
Program Manager

cc: Robert Krivinkas, NETC
Dan Kopcow, FWENC
Jack Biswurm, FWENC
Don Vogen, FWENC
Project File



MELVILLE SOIL PILES REMOVAL OPERATIONS
PHOTO-LOG

PHOTO	DATE	USER	DESCRIPTION
1	5-29-96	E.C	Personal Decontamination Area / Site Support Picture looking East
2	5-29-96	E.C	Loading Out Soil Pile #4 along West edge of Soil Piles. Material headed to McCallister Point Land Fill. Picture looking North
3	5-30-96	E.C	Pugmill arrived on site and set into position Picture looking NW.
4	5-31-96	E.C	Pugmill set up and begin to build access ramp to Pugmill Feed Hopper. Picture looking NW
5	5-31-96	E.C	Begin cutting access ramp into North side of soil Pile to access soil Pile No. 5. Picture looking South.
6	6-3-96	E.C	Excavator is stockpiling soil Pile No. 5 at the top of the access ramp for the loader. Picture looking SE.
7	6-3-96	E.C	Soil Pile No 5 material is being screened onto 60 mil plastic and awaiting transport to the pugmill. Picture looking E.
8	6-4-96	E.C	General overview of Pugmill in operation Picture looking N, NE.
9	6-4-96	E.C	General overview of Pugmill operation Picture looking NE.
10	6-4-96	E.C	Large pieces of Debris are being stockpiled. This Debris is associated with soil pile No. 5 Picture looking SE.
11	6-4-96	E.C	Continued screener operations associated with soil Pile No 5. Picture looking E.
12	6-5-96	E.C/J.S	Debris Pile associated with soil Pile No 5 continues to grow. Debris is being staged along the NW edge of stockpiled soil.
13		J.S	General overview of support Area. Picture looking N.
14		J.S	Personnel / Equipment Decon, Drum Storage Area and south edge of soil Pile No 1 can be seen. Picture looking NE.

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MELVILLE SOIL PILES REMOVAL OPERATIONS
PHOTO-LOG

PHOTO	DATE	USER	DESCRIPTION
15		J.S	Screeners prepared for Demolition Picture looking N.
16		J.S	Two Debris Piles have been formed from soil Pile No 5. One Pile on the left of picture, the other pile to the Right (behind the loader). S
17	7-29-96	E.W	Relocated Drum storage area and Heavy Equipment Decon Pad along SW edge of site. Picture looking SW
18	7-29-96	E.W	Former Pugnill, screeners and Heavy Equipment Pad locations. All equipment removed from Northern half of site. Picture looking N.
19	7-29-96	E.W	While removing west edge of Soil Pile No 1 down to and including the liner, Pieces of Debris could be seen immediately beneath the liner. The operator was instructed to determine the depth of debris beneath the soil pile liner. Approx- six inches down land fill Debris was uncovered
20	7-29-96	E.W	Operator Begins removing west Berm (constructed from soil Pile No 6) and placed with Land fill material headed to Plumville, MA. Picture looking NE.
21	7-29-96	E.W	West Berm was constructed out of 2x4 Bales and plastic to prevent water run off from soil Piles. Picture looking SE.
22	8-16-96	E.W	South Edge of Soil Pile No. 1 (containing elevated PCB levels) was demarcated with fence post to prevent operator from creating contaminated soil.
23	8-26-96	E.W	Continue to load out ESMI Trucks with soil Pile No. 1 material down to and including the soil Pile liner. Picture looking SE.
24	8-26-96	E.W	Same as Above
25	8-30-96	E.W	South edge of Soil Pile #1 remains to be shipped off site. Picture looking SE.
26	8-30-96	E.W	South Edge of Soil Pile #1 remains to be shipped off site, Picture looking E.
27	9-4-96	E.W	Begin loading out PCB contaminated soil (south edge of Soil Pile #1). Picture looking N.

