UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

November 2, 1994

Mark Evans, Remedial Project Manager
U.S. Department of the Navy
Naval Facilities Engineering Command
Northern Division
10 Industrial Highway
Code 1823, Mail Stop 82
Lester, PA 19113-2090

Re: Review of Plans and Specifications for Spent Acid Storage and Disposal Area

Dear Mr. Evans:

I am writing in response to your request for EPA to review the design analysis for removal of the Spent Acid tank and remediation of PCB contaminated soil. Most of our comments relate to how the spent acid tank and soil will be removed and are listed on Attachment A.

I look forward to working with you on this issue. Please do not hesitate to contact me at (617) 573-5777 should you have any questions or wish to arrange a meeting.

Sincerely,

Kymberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: Mark Lewis, CT DEP, Hartford, CT
Andy Stackpole, NSBNL, New London, CT
Mary Sanderson, USEPA, Boston, MA
Dan Winograd, USEPA, Boston, MA
Patti Tyler, USEPA, Boston, MA
Dale Weiss, TRC, Lowell, MA

ATTACHMENT A

Page	Comment
Section 02220, Page 5, Part 3.1.1	The specifications should address the potential need for groundwater dewatering systems. The specification should require the collection, testing and proper disposal of groundwater collected by dewatering operations (*see also* Section 02990, Page 11, Part 3.1.5.3).
Section 02990, Page 2, Paragraph 3	The text should identify that the referenced maximum depth of excavation, 10 feet, is representative to approximate depth of the groundwater. Further, the specifications should also note that depth to groundwater is subject to seasonal fluctuation.
Section 02990, Page 2, Paragraph 5, Bullet 5	As previously indicated in comments submitted for the Focused Feasibility Study (FFS) pertaining to the Spent Acid Storage and Disposal Area, concentrations of cadmium, arsenic, and chromium were detected in the soil above the CTDEP TBC standards for TCLP leachate. Considering the limited number of samples (3 samples) used to characterize the subsurface soil and the historical acidic conditions associated with this location, additional confirmatory analyses should be performed for cadmium, arsenic, and chromium to ensure that existing concentrations do not pose any future impact on groundwater quality (*see also* Section 02995, Page 4, Part 3.1.4, Paragraph 2 and Part 3.1.5, Paragraph 3).

Appendix A, Earthwork Calculations, Page 1, Total Volume of Bituminous Concrete to be Removed

It is unclear what the quantity "207.5 sf" represents. Additionally, "45 sf" represents the area associated with the 3-foot by 15-foot reinforced concrete pad, and is not constructed of bituminous concrete. Therefore, the "45 sf" should be subtracted from the total area by changing the "-" to a "+" within the brackets.

Appendix A, Excavation at PCB Site

Based on review of the boring logs, groundwater may be encountered above a depth of 10 feet. If seepage occurs, the potential for a slope failure exists possibly resulting in damage to Building 496. In addition, the removal of soil from the sides of the building may result in a reduction of bearing capacity of the soils supporting Building 496's foundation. Finally, the classification of the existing soils as OSHA Type "B" is not appropriate. The existing soils at the site consist mainly of miscellaneous unconsolidated fill, typical of a landfill. Fills of this nature generally have poor strength characteristics. A geotechnical engineer should evaluate the existing available information to determine what impacts the excavation will have on Building 496, and provide an earth support design "OSHA Option 4 - 29 CFR 1926.653(c)(40)."

Drawing B-2

Asbestos was identified in Boring Log 2LTB23, which is located in the middle of the PCB excavation area. Based on the description in the log, it appears that asbestos was identified in the boring from 0 to 8 feet in depth. Therefore, Asbestos Contaminated Materials ("ACM") also should be mentioned in Specification Section 02990 and on Drawing B-2. A section on the identification, sampling, analysis, excavation, stockpiling and disposal of ACM soils should also be added to the specification.