



FOSTER WHEELER ENVIRONMENTAL CORPORATION

July 20, 1998

Ms. Anne Malewicz
Massachusetts Department of Environmental Protection (DEP)
Bureau of Waste Site Cleanup
One Winter Street
Boston, MA 02108

Re: Addendum to Underground Storage Tank (UST) Closure
Release Abatement Measure (RAM) Plan (dated May 7, 1998);
Nomans Land Island, Chilmark, MA. (site), DEP RTN 4-13390

Dear Anne,

On behalf of the United States Department of the Navy (Navy), Foster Wheeler Environmental Corporation (Foster Wheeler) is submitting this RAM Plan Addendum for the removal of additional USTs at the site referenced above. The original RAM Plan was for the removal of one 10,000-gallon fuel oil UST and presumed associated pipeline. The plan was approved by the DEP (without conditions) in a letter dated May 20, 1998.

The field work for the removal of the 10,000-gallon UST and pipeline began the week of June 15, 1998. Subsequent to the removal of the UST and the pipeline near the shoreline, it was discovered that the pipeline did not connect to the UST, but actually connected to a series of USTs previously undocumented located near the remains of the Seabees buildings.

The additional USTs are approximately 6,500-gallons (2) and 5,000-gallons in size and each contain some product (oil) and water (approximately 10,000-gallons total for all three USTs). A piping network connects the USTs to each other and to the main pipeline. A sample of the product was collected and laboratory analyzed for petroleum fingerprint and ignitability. The analyses indicated that the oil has GC/FID characteristics similar to fuel oil #2/diesel fuel, and the ignitability was 182 degrees Fahrenheit.

The exposed (overburden soil removed) newly discovered USTs and associated piping were inspected by yourself and Mr. Naparstek from your office during the site visit on June 24, 1998.

Foster Wheeler intends to remove the three USTs and associated piping as part of the approved RAM Plan for UST closure. The work is consistent with the general provisions for RAMs as defined by the Massachusetts Contingency Plan and the original RAM Plan. In addition, the response action will fulfill the tank abandonment requirements in the Massachusetts Board of Fire Prevention Regulations. The work will involve the same activities presented in the original RAM Plan, including:

- Removal and off-site transport and disposal of oil and water within USTs;
- Cleaning and rendering inert the USTs;
- Removal of USTs and piping;
- Soil sampling for field screening and confirmatory laboratory analyses;
- Re-grading and site restoration;
- Off-site transport and disposal of USTs and piping, and tank cleaning waste; and
- Completion of required reporting and documentation.

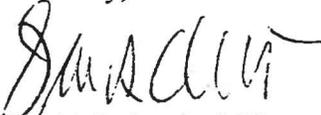
Consistent with the approved RAM Plan, the additional RAM tasks will be completed in compliance with all applicable local, state and federal laws and regulations, and work will follow the DEP *Commonwealth of Massachusetts Underground Storage Tank Closure Assessment Manual* (dated April 9, 1996). Specifically, the work will be conducted as outlined in Section 2.0 of the RAM Plan (e.g. handling of remediation waste, monitoring plan, etc.) and consistent with the 10,000-gallon UST removal. If petroleum-impacted soils and/or groundwater are encountered, the DEP will be notified as appropriate, and procedures summarized in the RAM Plan will be implemented.

The results of the additional UST removals will be provided in the required RAM submittal(s) (Status Report[s] and/or Completion Report).

The work is expected to be initiated this month and will take approximately 7 business days to complete the field work.

If you have any questions concerning this letter, please contact me at (617) 457 - 8250.

Sincerely,



David G. Austin, LSP

cc. Dave Barney; Dept. of the Navy
Heather MacDonough; Dept. of the Navy
Dawn Kincaid; Dept. of the Navy
Bub Oliveira; USF&WS
Jack McIlrath; Foster Wheeler
Jim Ennis; Foster Wheeler

DEP File No.

[Empty box for DEP File No.]

(To be provided by DEP)

Form 1

City/Town Town of Chilmark

Applicant US Department of the Navy

Commonwealth
of Massachusetts

**Request for a Determination of Applicability
Massachusetts Wetlands Protection Act, G.L. c. 131, § 40**

1. I, the undersigned, hereby request that the Town of Chilmark
Conservation Commission make a determination as to whether the area, described below, or work to be performed
on said areas, also described below, is subject to the jurisdiction of the Wetlands Protection Act, G.L. c. 131, § 40.

2. The area is described as follows. (Use maps or plans, if necessary, to provide a description and the location of the
area subject to this request.)

Location: Street Address Nomans Land Island (Refer to attached Figure 1-1 - Site Location Map)

Lot Number: n/a

3. The work in said area is described below. (Use additional paper, if necessary, to describe the proposed work.)
(Refer to attached Project Description.)

4. The owner(s) of the area, if not the person making this request, has been given written notification of this request on
May 12, 1998 (date)

The name(s) and address(es) of the owner(s):

United States Department of the Navy

P.O. Box 169

Naval Air Station

South Weymouth, MA 02190

1134 Main Street

Contact: Mr. David Barney

5. I have filed a complete copy of this request with the appropriate regional office of Massachusetts Department of Environmental Protection May 12, 1998 (date)

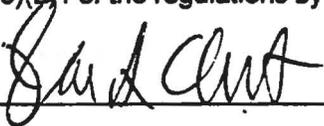
DEP Northeast Regional Office
10 Commerce Way
Woburn, MA 01801

DEP Southeast Regional Office	NEW ADDRESS
Lakeville Hospital	
Route 105	20 Riverside Drive
Lakeville, MA 02347	Lakeville, MA 02347

DEP Central Regional Office
75 Grove Street
Worcester, MA 01605

DEP Western Regional Office
State House West, 4th Floor
436 Dwight Street
Springfield, MA 01103

3. I understand that notification of this request will be placed in a local newspaper at my expense in accordance with Section 10.5(3)(b)1 of the regulations by the Conservation Commission and that I will be billed accordingly.

Signature  Name David G. Austin for Foster Wheeler Environmental Corporation

Address 470 Atlantic Ave. Boston, MA 02210 Tel. (617) 457-8250

Request for a Determination of Applicability
Underground Storage Tank (UST) and Pipeline Closure
(Release Abatement Measure)
NOMANS LAND ISLAND

Prepared by:

Foster Wheeler Environmental Corporation
470 Atlantic Avenue
Boston, MA 02210

May 12, 1998

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FIGURES

- FIGURE 1-1** Site Location Map
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ATTACHMENTS

- ATTACHMENT A** Photographs

1.0 INTRODUCTION

1.1 Project Description

The proposed work will involve the closure of an abandoned fuel underground storage tank (UST) and associated fuel pipeline on Nomans Land Island (site). This work will be conducted as outlined in a Release Abatement Measure (RAM) Plan which was submitted to the Massachusetts Department of Environmental Protection (MADEP) for approval pursuant to the Massachusetts Contingency Plan (MCP) on May 7, 1998. The location of the island is depicted in Figure 1-1 (Site Location Map) and in an aerial photograph (taken in March 1998) contained in Attachment A. Figure 1-2 (Site Plan) depicts the island.

The removal of the fuel line (an approximately 4-foot wide excavation) as part of the RAM will be within a resource area (coastal dune) and possibly within in-land wetlands and/or buffer zone. The exact location of the pipeline is unknown, therefore the resource areas that the excavation will traverse is unknown. According to a June 1985 soil classification map of the island by the United States Fish and Wildlife Services (FWS), most of the soil types in the RAM work area are classified as upland soils. However, as discussed below, environmental protection methods to minimize and mitigate any potential effects upon the resource areas will be implemented. In addition, consistent with the requirements of a negative determination, the work will not significantly alter the area.

The island was listed as a site by the MADEP in a Notice of Responsibility dated September 26, 1997 (Release Tracking Number 4-13390). The site was listed due to the potential release of hazardous materials during the historical use of the island as an air-to-surface target range by the Department of Defense (DOD).

The work proposed is being conducted concurrent with a RAM involving the neutralization of potential live ordnance and the removal and off-site recycling of inert ordnance debris. The RAM Plan for the ordnance debris was submitted to the DEP on May 4, 1998, and is intended to facilitate the removal of the UST and pipeline, the completion of a Phase I - Limited Site Investigation and any other necessary response action pursuant to the MCP. The UST closure and fuel line removal is one of several tasks involved in the transfer of the island from the DOD to the FWS as presented in a Memorandum of Understanding between the DOD and FWS.

After completing the ordnance clearance in the area of the UST and fuel line, the proposed work will involve the following activities:

- Removal of the UST;
- Post-excavation soil sampling and screening;
- Removal of fuel line;
- Soil sampling and screening along fuel line trench during excavation;
- Re-grading and site restoration;
- Off-site transport and disposal of UST and pipeline; and
- Completion of required reporting and documentation.

In the event that petroleum-impacted soils and/or groundwater are encountered during the proposed work, procedures that are summarized in the RAM Plan will be implemented and followed.

The response action will fulfill the tank abandonment requirements specified in the Massachusetts Board of Fire Prevention Regulations (527 CMR 9.00). The proposed work will be completed in compliance with all applicable local, state and federal permitting and approval requirements, including but not

limited to the MCP, Board of Fire Prevention Regulations and the Wetlands Protection Act Regulations (310 CMR 10.00). The work will follow the DEP *Commonwealth of Massachusetts Underground Storage Tank Closure Assessment Manual*, dated April 9, 1996.

Pursuant to 310 CMR 40.0441 (7), health and safety procedures consistent with the provisions of 310 CMR 40.0018 and the federal Occupational Safety and Health Administration (OSHA) will be implemented. In addition, all applicable public involvement activities pursuant to the MCP in 310 CMR 40.0447 will be conducted.

1.2 RAM Work Area Description

The estimated size of the UST is 10,000-gallons, and it is assumed to have contained diesel and/or #2 fuel oil. The exact location of the UST and pipeline have not been surveyed or located on a scaled map due to the history of the site, the age of the tank, and the remote location of the site. However, from photographs and field reconnaissance, the location of the RAM work area is depicted on Figure 1-2. As noted on Figure 1-2, the work area is located in the northern portion of the island. In addition, a photograph contained in Attachment A depicts the RAM work area and depicts the estimated location of the UST (the pipeline terminus is also shown). Photographs in Attachment A also depict the UST and the end of the pipeline at the beach or shoreline.

2.0 OVERVIEW OF PROPOSED WORK

This section provides an overview of the UST and pipeline closure which is described in detail in the RAM Plan. The work area will be cleared of any potential UXO and ordnance debris prior to the UST and pipeline removal (as proposed in the RAM Plan dated May 1, 1998).

Soil overlying the UST will be removed with hand shovels and an excavator. Initial excavations will be overseen by an UXO Specialist also working on the island as part of the ordnance debris removal RAM. Three separate stockpiles will be developed (if necessary): material which is petroleum-contaminated based upon field screening results, soil which contains some evidence of petroleum contamination and requires further testing, and soil which is clean. It is anticipated that the majority of the material overlying the UST and pipeline is clean and every effort will be made to reuse this material for backfill. After the UST is exposed, the tank will be inspected and cleaned, and prepared for safe off-site transport and disposal.

Excavation and removal of the fuel pipeline will begin at the end of the pipe within the area of the UST excavation. Similar to the UST, overburden soil will be removed in sections along with the pipeline as the excavation traverses the pipeline. Subsequent to tank and pipeline removal, soil screening and analyses consistent with the above referenced assessment manual will be conducted to document site conditions.

Should the local groundwater conditions dictate that de-watering is necessary, an appropriate method to extract water from the excavation will be employed along with the necessary temporary groundwater treatment system, most likely to be operated under a National Pollution Discharge Elimination System (NPDES) permit exclusion.

Because of the remoteness of the site and its history, no information concerning the integrity of the UST is available and no subsurface assessment has been conducted in the vicinity of the UST. In addition, the exact location of the pipeline as it traverses from the UST to its terminus is unknown. Therefore, the horizontal and vertical extent of any potentially petroleum-contaminated soil encountered during the UST and pipeline removal will be more accurately determined during removal with field screening and

sample collection. In addition, protection of resource areas will be implemented based upon the course of the pipeline excavation.

3.0 ENVIRONMENTAL PROTECTION

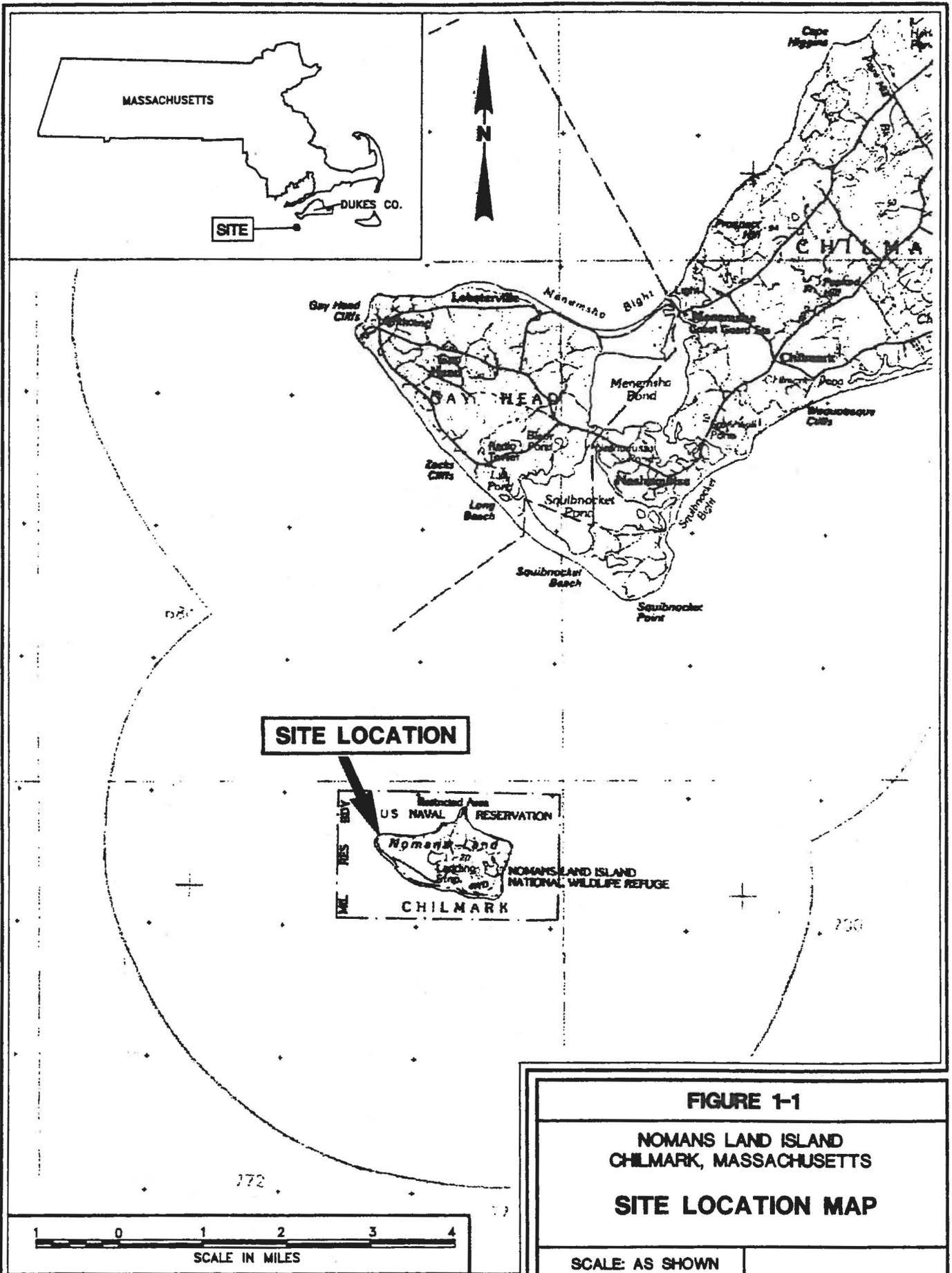
Prior to excavation within a resource area, a line of staked filter fabric or siltation fence will be installed along both sides of the expected trench location to minimize the potential of silt drainage into abutting areas. If necessary, hay bales will also be utilized to support the filter fabric. Figure 3-1 presents the details of the protection methods. The width of the excavation will only be extended to accommodate the removal of the pipeline. The depth of the excavation is expected to be approximately 4 feet. Soils removed from the excavation will temporarily be stockpiled along the trench within the filter fabric fence, prior to backfilling (assuming material is clean). If encountered, petroleum impacted soil will not be stockpiled within 25 feet of a resource area. The excavation at the pipeline terminus (within the coastal dune) will be completed without disturbing any potentially nesting birds. At the completion of excavations, all disturbed areas will be brought to grade and stabilized as appropriate.

4.0 PERMITTING AND PROPOSED WORK SCHEDULE

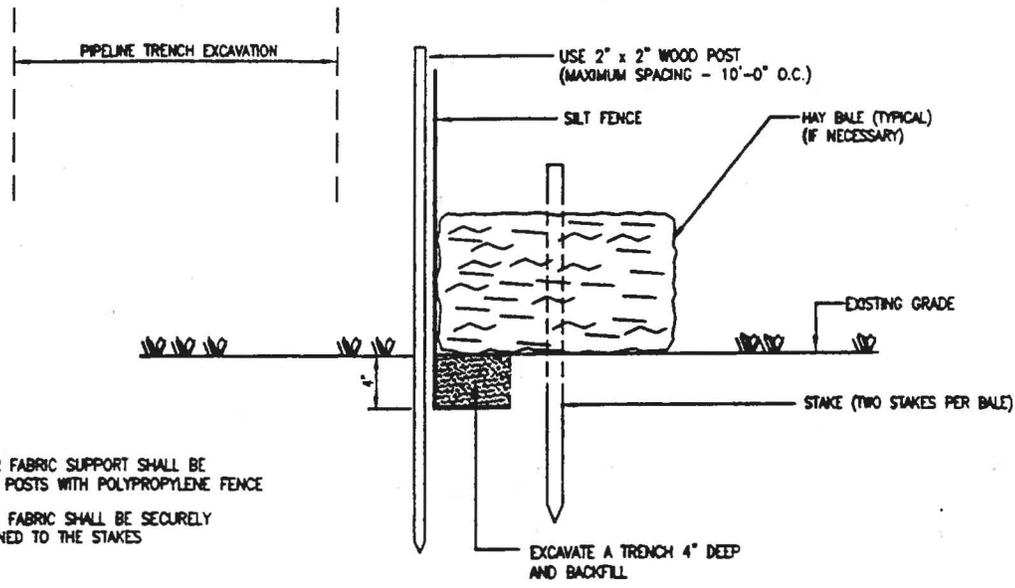
The only permit required to conduct the RAM is a signed UST closure permit (Form FP-292) from the Chilmark Fire Department. In addition, this Request for Determination of Applicability is being filed with the Chilmark Conservation Commission.

The schedule of activities for the RAM is as follows and depends upon the ordnance debris removal program. Most likely, the proposed work will be conducted in June 1998.

- Permits/utility clearance (one week)
- UST removal (one week)
- Fuel pipeline removal (two weeks)
- Site restoration (one week)
- Sample analyses (two weeks)



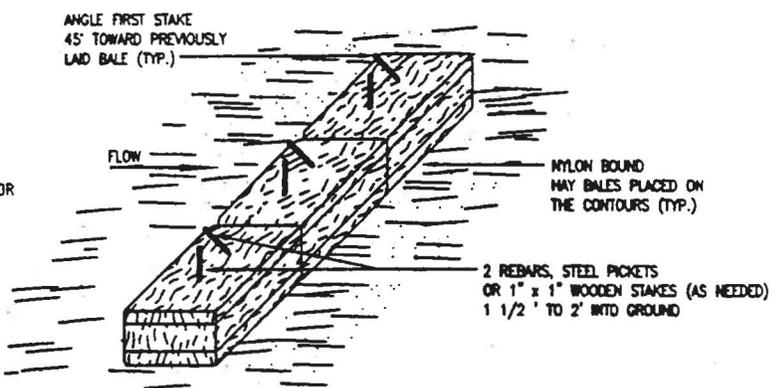
Source: USGS 30 Minute Series Topographic Map: Martha's Vineyard MA, 1994.



- NOTES:
1. FILTER FABRIC SUPPORT SHALL BE WOOD POSTS WITH POLYPROPYLENE FENCE
 2. FILTER FABRIC SHALL BE SECURELY FASTENED TO THE STAKES

TYPICAL SILT FENCE (ONE SIDE OF PIPELINE TRENCH)
AND HAY BALE (IF NECESSARY) DETAIL
NOT TO SCALE

- NOTES:
1. BALES SHALL BE PLACED IN A ROW WITH ENDS TIGHTLY ABUTTING THE ADJACENT BALES.
 2. INSPECTION SHALL BE ONCE EACH WEEK. REPAIR OR REPLACEMENT SHALL BE MADE PROMPTLY AS NEEDED.
 3. BALES SHALL BE REMOVED AND PROPERLY DISPOSED OF WHEN THEY HAVE SERVED THEIR INTENDED PURPOSE.

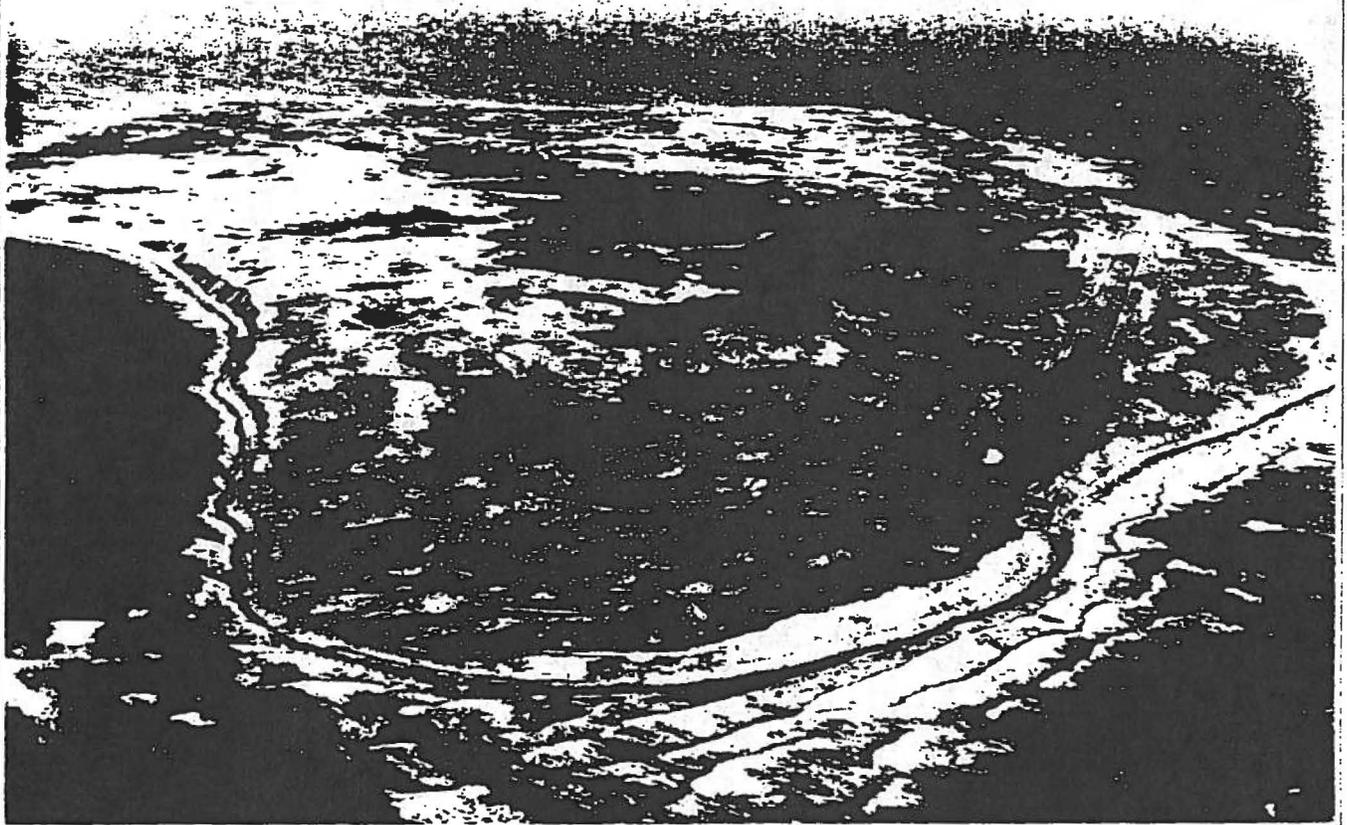


TYPICAL HAY BALE DETAIL
(IF INSTALLED)
NOT TO SCALE

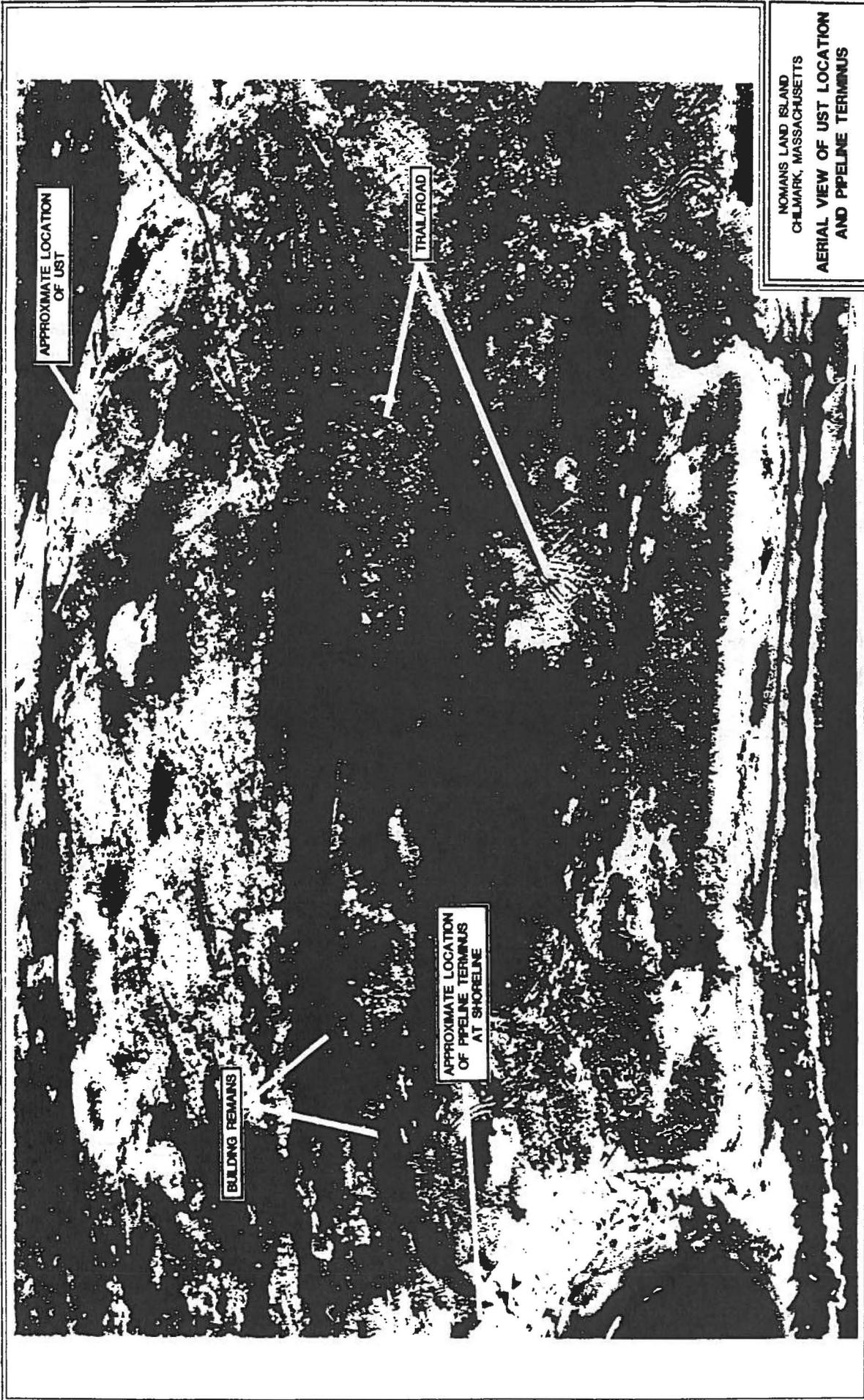
FIGURE 3-1

NOMANS LAND ISLAND
CHILMARK, MASSACHUSETTS

**EROSION AND SEDIMENT
CONTROL DETAILS**



NOMANS LAND ISLAND
CHILMARK, MASSACHUSETTS
AERIAL PHOTOGRAPH OF ISLAND
(LOOKING EAST)



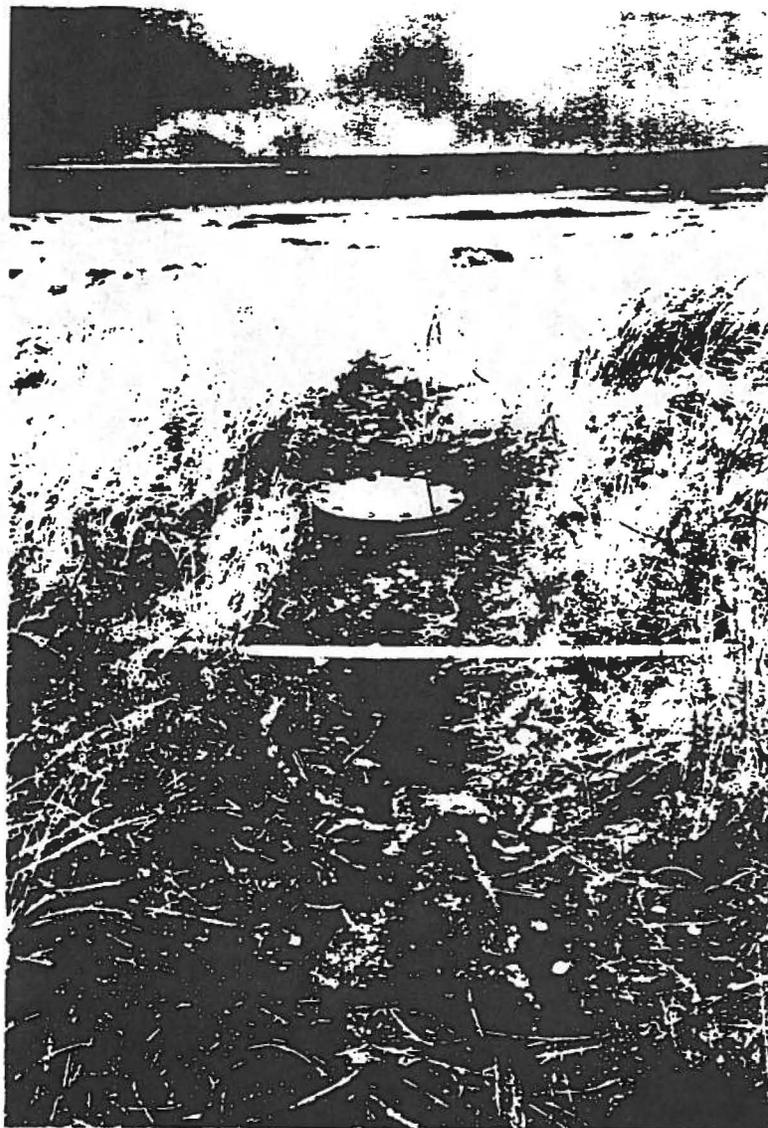
APPROXIMATE LOCATION
OF USIT

TRAIL / ROAD

BUILDING REMAINS

APPROXIMATE LOCATION
OF PIPELINE TERMINUS
AT SHORELINE

NOMANS LAND ISLAND
CHELMARK, MASSACHUSETTS
AERIAL VIEW OF USIT LOCATION
AND PIPELINE TERMINUS



**NOMANS LAND ISLAND
CHILMARK, MASSACHUSETTS
PHOTOGRAPH DEPICTING
UNDERGROUND STORAGE TANK**



NOMANS LAND ISLAND
CHILMARK, MASSACHUSETTS

**PHOTOGRAPH DEPICTING END
OF FUEL PIPELINE AT SHORELINE**