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NSWC INDIAN HEAD
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NAVFAC WASHINGTON RESPONSE TO COMMENTS ON DRAFT WORK PLAN REMEDIAL/
REMOVAL ACTION FOR SITE 42 AND SITE 17 NSWC INDIAN HEAD MD
5/20/2005
NAVFAC WASHINGTON

**Response to Comments
August 23, 2005**

**NAVFAC Washington Comments on
Draft Work Plan Remedial/Removal Action
for Site 42 – Olsen Road Landfill and Site 17
Naval District Washington - Indian Head
May 20, 2005**

General

Some sections (e.g. SSHSP) have been sent off for outside review and any comments received will be provided as soon as they arrive.

Response: *Comment noted.*

Section 1.2.1, page 1-2

In the 3rd paragraph, the correct chemical name for TCE is trichloroethane.

Response: *The correct chemical name for TCE is trichloroethene and it will be revised in the Final Work Plan.*

Section 2.3.1, page 2-3

In the 1st paragraph, change NTR to ROICC.

In the 2nd bullet, Appendix 6 should be Appendix G.

Response: *Both items will be revised accordingly in the Final Work Plan.*

Section 2.3.1, page 2-3

In the 1st paragraph, should Site Supervisor be Operations Supervisor (per Figure 2-1)?

Response: *Site Supervisor should be Operations Supervisor and it will be revised in the Final Work Plan.*

Section 3.1.9, page 3-7

In the 2nd paragraph, 3rd sentence, the meaning of “threes” is not understood – is it a typo?

Response: *There is a typo in this sentence. The words “threes of” will be removed from the sentence.*

Section 3.1.19, page 3-13

This section refers to a maintenance program for the wetland mitigation area – who will develop this?

Response: *The maintenance program for the wetland mitigation area will consist of monthly inspections performed by FSSI/Shaw until ten (10) weeks after formal acceptance by the Contracting*

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Section 4.1.2, page 4-4

In the 1st paragraph, the 2nd sentence should end at “zinc” and “results” should begin the next sentence.

In the 2nd paragraph, the samples should be sediment rather than soil.

Will the technique described for collecting the volatile sample work?

Response: Confirmation sampling is not required to be completed at Sites 42 and 17. The confirmation sampling section will be removed from the Final Work Plan.

Section 4.1.2, page 4-5

Non-disposable sampling equipment should also be cleaned *before* sampling.

Response: This paragraph discussing non-disposable sampling equipment will be moved to the end of Section 4.1.1 in the Final Work Plan and will be revised accordingly.

Section 4.1.3, page 4-5

Waste drums should also be properly labeled.

Response: Drums holding water will be properly labeled and this Section will be revised in the Final Work Plan.

Section 4.2, page 4-6

There is a sample numbering protocol used for Indian Head that should be followed. At the least, the matrix should indicate soil, sediment, surface water, etc.

Response: The sample numbering protocol for Indian Head will be followed and will be revised in the Final Work Plan.

Section 4.4, page 4-8

The last bullet refers to Section 3.20 for labeling; it should refer to Section 4.2.

Response: Comment noted. The content of Section 4.4 will be revised in the Final Work Plan and will no longer reference the section for labeling.

Section 4.5, page 4-8

Is tap water 1) organic-free and 2) available at the site?

Response: Distilled water will be used for decontamination of all sampling equipment at the site and will be revised in the Final Work Plan.

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Section 7.4.3

Given the potential for any site at NDW Indian Head to contain ordnance, it would be prudent to include basic munitions recognition training.

Response: Section 7.4.3, Worker Training will be revised to include basic munitions recognition training in the Final Work Plan.

Section 11.0

Add Site Approval to the list of permits required for Site 42.

Response: The list of permits required for Site 42 will be revised to include Site Approval in the Final Work Plan.

Appendix G

Figure 1-1

The Program Manager position has been reassigned.

Response: The Program Manager position will be revised in Figure 1-1 of the Quality Control Plan in Appendix G of the Final Work Plan.

Exhibit VI-1A Submittal Register Site 42

Add "G" to the Approving Authority column for the APP, HASP, EPP, and SECP. Also, the register seems incomplete in this respect for other submittals.

Response: The submittal register for Site 42 will be revised accordingly in the Final Work Plan.

Attachment 1 Program Quality Control Plan

The Program Manager position has been reassigned.

Response: The Program Manager position will be revised in Attachment 1 to the Quality Control Plan in Appendix G of the Final Work Plan.

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Navy Environmental Health Center
Environmental Programs Directorate Comments on
Draft Work Plan Remedial/Removal Action
for Site 42 – Olsen Road Landfill and Site 17
Naval District Washington - Indian Head
June 28, 2005

These comments were generated following review of the draft Health and Safety Plan for Sites 42 and 17.

Ref: (a) 29 CFR 1910.120 (Hazardous Waste Operations and Emergency Response)
(b) 29 CFR 1926.65 (Hazardous Waste Operations and Emergency Response)
(c) Navy/Marine Corps Installation Restoration Manual (February 1997)
(d) U. S. Army Corps of Engineers, Safety and Health Requirements Manual, EM 385-1-1

General Comment: We compared this health and safety plan (HASP) to federal requirements found in references (a) through (d), and have noted discrepancies in this HASP from these primary references. The acronyms used in our comments are attached.

Response: *Comment noted.*

Administrative Comments:

1. This document is noted to be confusing and incomplete. We suggest the following site for assistance in preparing an acceptable health and safety plan: <http://www.osha.gov/dep/etools/ehasp>. This e-tool can be downloaded and used for creating site-specific health and safety plans. An additional source of guidance can be found at <http://www-nehc.med.navy.mil/downloads/ep/checklist002.pdf>. This site provides a checklist, which will assist in preparing the HASP ensuring all required information is included.

Response: *Comment noted and taken into consideration in making changes to the Final SSHSP.*

2. Various Shaw Health and Safety Procedures such as HS400, "Working in Hot Environments," HS045, "Job Safety Analysis," HS600, "Personal Protective Equipment," and HS601, "Respiratory Protection Program," are cited as guiding documents for this project. These procedural documents should be made available on-site for review or the pertinent information incorporated into the health and safety plan.

Response: *The necessary Shaw Health and Safety Procedures will be included in the Final SSHSP. The Site Safety Officer will be responsible for maintaining up-to-date versions of these procedures on site.*

3. Neither location nor site maps were included in this document for Site 17 or Site 42. A location map will show the general area where the site is located in relation to the base or surrounding area in general. Site maps show the proposed layout of the site, such as location of proposed work, decontamination facilities and/or major structures or obstacles such as buildings, roads, gullies, or bodies of water, etc.

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- b. Revise this entire section, identifying what information applies to which site and in an appropriate sequence, clearly delineating/distinguishing between the two sites. We recommend separate sections describing the details such as Section 2.21, "Site 17," and Section 2.2.2, "Olsen Road Landfill."

Response: The above-mentioned sections will be revised accordingly in the Final SSHSP.

3. Page 3-1, Section 3.0, "Key Personnel and Management":

Comment: The fourth sentence of the second paragraph states, "The SS/SSO will be the main contact in any on-site emergency situation and will insure off-site emergency agencies have been contacted prior to start of work." Both of these officials are listed as "TBD." As this document is intended to be site-specific, the names of these company officials should be readily available.

Recommendation: Appoint an appropriate company official to fill this/these important post/s so that the important functions of the position can be accomplished in a timely manner.

Response: Section 3.0 will be revised accordingly in the Final SSHSP.

4. Pages 4-1 through 4-19, Section 4.0, "Activity Hazards":

Comments:

a. Pages 4-1 through 4-3, information provided in the table entitled "Levels of Site Contaminants" lists PAHs as site COPCs. Table 4-1 includes no information pertaining to these PAHs.

b. Section 4.2, "Hazard Communication," cites 29 CFR 1926.59 as the guiding reference for hazard communication issues. The more appropriate citation is 29 CFR 1910.1200.

c. Section 4.2.3, "Employee Information and Training," cites 29 CFR 1910.120 for HAZWOPER training information.

d. Section 4.4.1, "Heat Stress," cites the "Shaw Health and Safety Procedure HS400, Working in Hot Environments" as outlining methods for preventing heat stress injuries. This document was not provided for review so we cannot comment on its completeness. However, information describing the signs, symptoms and the proper field treatment and management of heat stress injuries was not included in this HASP.

e. Page 4-6, Table 4.2, Guidelines For Work-Rest Periods Protection Level Number of Hours Before Rest Period": It is unclear how the guidance for Level C PPE and above was determined.

f. Pages 4-5 and 4-6, Section 4.4.1, "Heat Stress" fourth paragraph states "Each individual will count his/her radial (wrist) pulse as early as possible during each rest period. If the heart rate exceeds 75 percent of their calculated maximum heart rate (MHR = 200 – age) at the beginning of the rest period, then the cycle will be decreased by one-third." Guidance provided in the ACGIH TLV/BEI, dated 2005, recommends the use of a heart rate (HR=180 –age) vice 200.

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g. Revise the final health and safety plan to include completed AHAs for all major tasks, such as drum handling, soil sampling, or trenching that will be performed under this scope of work. We recommend use of the three column format found in the U. S. Army Corps of Engineers Safety and Health Requirements Manual, page 8, Figure 1-2, EM 385-1-1, 2003, for its simplicity and ease of use to assist in ensuring completeness of the AHAs.

Response: *AHAs for all major tasks have been completed and comply with the requirements of EM 385-1-1, 2003.*

5. Page 6-1, Table 6.1, "Anticipated Protection Levels":
Page 8-1, Table 8.1, "Direct Reading Air Monitoring Requirements":

Comment: Guidance for "Site 17: Excavation of Materials and Drum Overpacking" directs the initial use of Level D/Modified Level D PPE with possible upgrade to Level B PPE if subsurface barrels or surface barrels containing unknown materials or liquids encountered. Guidance noted in Table 8.2, "Direct Reading Air Monitoring Requirements" for Site 17 directs upgrade to Level B if an action level of greater than or equal to 1.0 ppm is noted. It is unclear what substance/s site workers are protecting against as no information is included stating what compound/s would generate this response.

Recommendation: Revise the final site-specific HASP to include information clearly stating what COPCs are being monitored.

Response: *The drums are of an unknown nature therefore, there is no way to identify what airborne contaminants may be present. If any airborne contamination is detected during the handling of these drums, the contaminant is considered unknown and the appropriate safety protocol is to utilize Level 'B' PPE.*

6. Page 7-3, Section 7.3, "Disposal":

Comment: The first sentence state "All decontamination liquids and disposable clothing will be treated as contaminated waste unless determined otherwise by accepted testing methods." It is unclear if this waste will be containerized until testing is completed to determine acceptable method/s of disposal.

Recommendation: Include information stating that all spent decontamination liquids will be containerized until test results are available.

Response: *Section 7.3 will be revised accordingly in the Final SSHSP.*

7. Pages 8-1 through 8-5, Section 8.0, "Air Monitoring":

Comment: On page 8-3, information provided in Section 8.2.1.3, entitled "Calibration Methods/Frequency" discusses the calibration of the combustible gas indicator (CGI) meter and "recommends" the CGI be calibrated before and after each use. Then on page 8-5, Section 8.4, entitled "Calibration Requirements," the first sentence states "The PID and the LEL/02/H2S will be calibrated daily before use."

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Recommendations:

a. Revise the final HASP to clearly state what response group will be briefed, either Shaw Environmental or off-site responders. Use consistent terminology throughout the HASP to prevent confusion. Additionally, if Shaw Environmental employees will be providing emergency response, then information regarding their level of training; for example, first responder awareness level, first responder operations level, hazardous materials technician or hazardous materials specialist, must be included in the HASP.

Response: The Final SSHSP will be revised accordingly.

b. Contact the Base RPM to determine the correct point of contact. Include the telephone number for contacting the LEPC in the final HASP.

Response: The Final SSHSP will be revised accordingly.

c. Revise the final HASP to include the more appropriate POCs and the correct telephone numbers. All emergency responders' telephone numbers should be verified prior to the start of on-site operations.

Response: The Final SSHSP will be revised accordingly.

d. Emergency response drills should be conducted as soon as feasible after a new site is activated. These drills or actual events must also be critiqued for lessons learned.

Response: The Final SSHSP will be revised accordingly.

e. Revise the final HASP to include information stating the first-aid/CPR have received the Bloodborne Pathogens training in accordance with the requirements of 29 CFR 1910.1030.

Response: The Final SSHSP will be revised accordingly.

f. Include guidance in the final HASP stating how a seriously injured contaminated worker would be managed.

Response: The Final SSHSP will be revised accordingly.

9. Page 10-1, Section 10.0, "Training Requirements":

Comments:

a. The third sentence of the first paragraph states, "In addition, all personnel must receive annual 8-hour refresher training and three-day on-site training under a trained, experienced Superintendent." The

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NOSC:	Navy On-Scene Coordinator
NOSCDR:	Navy On-Scene Commander
OSHA:	Occupational Safety and Health Administration
OV:	Organic Vapor
PCB:	Polychlorinated Biphenyl
PEL:	Permissible Exposure Limit
PID:	Photoionization Device
PPE:	Personal Protective Equipment
PPM:	Parts Per Million
SCBA:	Self Contained Breathing Apparatus
SOP:	Standard Operating Procedure
STEL:	Short Term Exposure Limit
TLV:	Threshold Limit Value

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Table 1: Review Comments

Comment Number	Section/Page	Statement or Issue	Comment
1	Program Quality Control (QC) Plan Addendum, Section 1.0, Figure 1-1, and Exhibit IV-1A	Distribution List and Approval Signatures are incomplete.	<p>At the time this project review was performed, only the laboratory and key contractor personnel had been identified. Subcontractors had not been identified.</p> <p>Final project-planning documents should include a list of key personnel (including contractor, subcontractor and laboratory personnel) who are to receive copies of the Work Plan and any relevant attachments (e.g. Program QC Manual and Program QC Plan Addendum). Project-planning documents should include spaces for signatures to indicate contractor, subcontractor, and laboratory acceptance of relevant specifications. [See EPA QA/G-5 Sections 2.1.1 and 2.1.3]</p>
<p>Response: <i>The Final QC Plan Addendum will be revised to include subcontractor key personnel. A signature sheet will be included in the Final Work Plan to document acceptance of the relevant specifications by key personnel.</i></p>			
2	Work Plan, Section 1.0, page 1-1	Problem Definition/Background is incomplete.	<p>Project-planning documents do not provide information on:</p> <ul style="list-style-type: none"> — The expected concentration and distribution of constituents of concern, — Background concentrations of metal constituents of concerns (lead, mercury, and zinc), or — Site-specific action limits or decision criteria. <p>This information forms the basis for the development of Data Quality Objectives and appropriate sampling and analysis requirements. [See G-5 Section 2.1.7 and EPA QA/G5S, <i>Guidance on Choosing a Sampling Design for Environmental Data Collection</i>]</p>
<p>Response: <i>The expected concentrations and background concentrations of the constituents of concern will be included in the Final Work Plan. Action limits or decision criteria will not be included in the Final Work Plan because post excavation sampling is not required at Sites 42 and 17.</i></p>			
3	Work Plan, Section 1.0, page 1-1	Project/Task Description is incomplete.	<p>The following information was not available for review:</p> <ul style="list-style-type: none"> — Work schedules, — Start and completion dates, — Resource and time constraints, and — Maps or diagrams <p>The project team should ensure this information is included in the final project-planning documents. [See G-5 Section 2.1.6.</p>
<p>Response: <i>The project schedule includes the start and completion dates and diagrams of the project and is included in Appendix A. This project schedule will be updated in the Final Work Plan. A brief summary of the work schedule to include resource and time constraints will be included in the Final Work Plan.</i></p>			

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Comment Number	Section/Page	Statement or Issue	Comment
7	Work Plan Section 4.1, pages 4-1 to 4-5	Sampling Design and Sampling Methods (all media) is incomplete.	<p>Inadequate information is provided to ensure that collected samples will represent actual site conditions. Because contaminants generally are not homogeneously distributed throughout solid media (e.g. wastes, soils, and sediments), the collection of discrete or 'grab' samples of these media will not provide representative information. The collection of composite samples should be considered for all solid media.</p> <p>Clear sampling instructions and diagrams should be provided for all media so that field personnel will know the following:</p> <ul style="list-style-type: none"> — How to determine when excavation activities are complete, — How to select specific sample locations that are 'representative', — What criteria should be used to determine which excavator bucket or shovel represents an 'average', — How many subsamples to collect for each composite, and — How to homogenize solid samples before they are placed in containers. <p>Detailed standard operating procedures (SOPs) should be provided for each sampling method, and these SOPs should be available in the field.</p>
<p>Response: <i>Waste characterization samples will be collected, however post excavation samples will not be collected at Sites 42 and 17, and will be revised in the Final Work Plan. Shaw Standard Operating Procedures (SOPs) will be included as Appendix J of the Final Work Plan. Shaw SOP TS-011 discusses subsamples for each composite, Shaw SOP T-FS-011 discusses homogenizing solid samples before they are placed in containers, and Shaw SOP TS-106 discusses the issue of selecting specific representative sample locations. Text referencing the excavator will be removed from the Final Work Plan since samples will be collected from excavated soil that has been placed in piles.</i></p>			
8	Work Plan Section 4.1.2, page 4-4	The Work Plan does not list specific contaminants of concern for Site 42.	<p>Table 1 does not include the list of specific analytes included for each type of analysis (e.g. volatiles, semivolatiles, metals.)</p> <p>The basis for the planned analysis of the stream sediment confirmation sample (Site 42) should be explained. Laboratory analysis should focus on site-specific constituents of concern. The project team should verify that the target analyte lists match the constituents of concern. [Note: This should be done during the development of DQOs and MPCs – see comments 4 and 5]</p>
<p>Response: <i>This is a non-issue since post excavation samples will not be collected at Sites 42 and 17.</i></p>			

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Comment Number	Section/Page	Statement or Issue	Comment
12	Section 4.11, page 4-13	Laboratory instrument calibration requirements are incomplete.	Specific procedures for performing and documenting instrument calibration must be described in laboratory SOPs, which should be referenced in the final project-planning documents. The procedures must meet requirements contained in the analytical methods and the DoD QSM.
Response: Section 4.11.5 will be added to the Final Work Plan to address instrument calibration requirements.			
13	Section 4.11, page 4-13	Laboratory deliverables are not defined.	The final project-planning documents should specify the format and content of both hard-copy and electronic laboratory deliverables.
Response: Section 4.11.8 will be added to the Final Work Plan to address laboratory reporting deliverables in the form of summary reports.			
14	N/A	Information on planned data review procedures was not provided.	Final project-planning documents should discuss procedures for: <ul style="list-style-type: none"> — Data verification, — Data validation, and — Data quality assessment [see IRCDQM, Appendix H]
Response: Section 4.12 will be added to the Final Work Plan to address data verification concerns. Data validation will be performed by a third party. As stated previously, no post excavation samples will be collected and no field QC samples will be collected. There is no project specific DQO except for removal of soil for disposal.			