



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Section : 2.01
Site 20903-5640 (White Oak)
Doc. #: 0010

00038

N60921.AR.000195
NSWC WHITE OAK
5090.3a

March 31, 1999

Mr. Walter Legg
Engineering Field Activity Chesapeake
Washington Navy Yard, Building 212
901 M Street, S.E.
Washington, DC 20374-5018

Re: Review of Revised Draft Work Plan for Site 4 Soil Removal for the Former Naval Surface Warfare Center

Dear Mr. Legg:

The United States Environmental Protection Agency Region III has reviewed the above report and has the following comments:

GENERAL COMMENTS

1. The excavations will be backfilled with a combination of material obtained from an off-site location and excess material from the excavation of the groundwater collection trench. It is not clear whether any of the proposed backfill has been tested to confirm if it is suitable backfill material. For instance, the groundwater collection trench was excavated in an area of known contamination. The WP should be revised to detail what testing has or will be performed on the proposed backfill material to verify that contamination does not exist.
2. The WP does not provide any contingencies for dust control. It is expected that some dust generation will occur due to the excavation of soil and waste, the use of heavy equipment, and truck traffic. The WP should be revised to describe dust control procedures that will be implemented at the site.
3. The WP does not provide a schedule for soil removal actions. A primary component of the WP is the schedule. A schedule should be provided for review and reference.
4. The WP does not provide job descriptions or address lines of authority. It is unclear from the text who will be in charge of the work and who has authority for implementing specific procedures identified in the WP and other plans.
5. The WP states that waste excavated from the burial areas will be placed in the eastern end of Site 4 before loading onto trucks for off-site disposal, is this the Load Out Area as shown in Figure 1? If it is, specify in the narrative. Also, specific information about the Load Out Area (which is a soil staging area) is not provided. The report should provide

detailed information about the Load Out Area, including how long waste will remain in this area, whether waste will be covered, the construction of berms around the area, and whether a liner will be used.

SPECIFIC COMMENTS

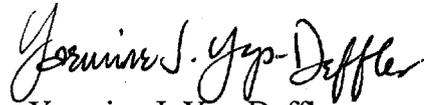
1. Section 3.3, page 3-2. This section discusses the excavation, backfill, and compaction construction activities. However, more information should be provided in the text to further describe actions that will occur during excavation, backfill, and compaction. The following areas should be addressed:
 - a. The text states that obviously contaminated soil will be further excavated. However, the only identifiers for obviously contaminated soil are elevated PID reading or visual. The text should be revised to state specifically what will be considered obviously contaminated (e.g., stained soil, presence of waste, or PID readings of five (5) ppm above background).
 - b. It is unclear from the discussion provided in the text how material from the excavation will be transported to the Load Out Area. The text should be revised to explain how soil excavated with the CAT 320 excavator will be moved to the Load Out Area for loading onto the disposal trucks.
 - c. The second paragraph states that the sides of the excavation will be benched or sloped. However, it will be very difficult to bench or slope the excavation sidewall that is parallel to Perimeter Road. Additional instruction should be provided in the text that describes how the sidewall along Perimeter Road will be braced, benched, or sloped.
 - d. It is unclear from the text when confirmatory sampling will occur. Will confirmatory sampling occur after each burial area has been entirely excavated, or will excavating and confirmatory sampling occur in stages? The text should be revised to address this issue.
2. Section 3.4, page 3-2. The text states that decontamination water will be sampled and disposed either on-site or off-site depending upon analytical results. However, specific details about decontamination water sampling are not provided. The text should be revised to state who will collect these samples, what specific parameters will be analyzed, and the on-site and off-site disposal location.
3. Section 3.4, page 3-3. The text states that waste will be characterized as either hazardous or nonhazardous, or a combination of the two based upon waste disposal samples collected on February 9 and 10, 1999. However, no information is provided about the

staging of hazardous and nonhazardous waste. For instance, will separate staging areas be constructed for hazardous and nonhazardous waste? The text should provide specific details about the staging of waste in the Load Out Area. The WP should also describe how excavated waste that is a "combination of the two" will be handled. Will such material be handled in the same manner as hazardous waste?

It is also unclear whether waste will be sampled as the excavation progresses or whether the soil will be classified (e.g., hazardous or nonhazardous) based on the previously collected waste disposal samples. The text should be revised to provide additional information about the collection and analysis of waste disposal samples, including the frequency of collection, analysis parameters, and type of samples (e.g., grab or composite).

If you have any questions concerning the above comments, please contact me at (215)814-3369.

Sincerely,



Yazmine J. Yap-Deffler
Remedial Project Manager
Federal Facilities Branch

cc: Henry Sokolowski, EPA Region III
Jeff Thornburg, MDE
Steven Richard, GSA
Robert Craig, Adelphi Research Laboratory