



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II

JACOB K. JAVITS FEDERAL BUILDING

NEW YORK, NEW YORK 10278-0012

OCT 06 1993

John Koliccius  
Naval Facilities Engineering Command  
10 Industrial Highway  
Code 1821, Mail Stop 82  
Lester, PA 19113-2090

R : NWS Earle  
Removal Action at Site 20

Dear Mr. Koliccius:

The U.S. Environmental Protection Agency (EPA) has reviewed the Work Plan and Health and Safety Plan for the above referenced subject.

This Work Plan lacks the specificity and details required regarding QA practices on a site where the EPA will potentially be signing a "No Further Action" ROD. The following comments (see Attachment 1) list the topics that must be expanded upon in the revised version of this Plan. It is an inefficient expenditure of EPA resources to review a Plan that does not address basic QA issues. Considerable time and effort has previously been expended on the NWS Earle site to gain approval of the Plans required for the Remedial and Site Investigations. The same type of information is required here yet the Navy has failed to provide it for EPA review.

The EPA does not want to be overburdensome in requirements for the Health and Safety Plan (see Attachment 5), but EPA also wants to make sure that the Navy complies with OSHA and protects the health and safety of the individuals conducting the work.

The following comments must be addressed prior to approval of the Plans and commencement of field activities.

If you have any questions concerning this matter, please contact me at 212-264-6609.

Sincerely yours,

*Paul G. Ingrisano*  
Paul G. Ingrisano  
Project Manager  
Federal Facilities Section



**Enclosures**

cc: LCDR S. Smith, NWS Earle  
R. Marcolina, DEPE



## Attachment 1

## General Comments

1. State the name of the contractor organization, as well as specific personnel and their responsibilities, assigned to conduct the tasks outlined in this WP. This applies to both the field and laboratory hires.

## Section C. Sampling and Analysis

2. This section should contain a parameter table which summarizes the parameters, holding times, preservation requirements, and sample bottle information. This is applicable to the soils from the stockpile, excavated area, and that used for backfilling.

3. State the source of the sample bottles. The bottles used must be free of contamination for the parameters of interest at the concentration of interest. Attachment 2, OSWER Directive 9240.0-05A, addresses the procedures used for bottle cleaning and QC in order to ensure contaminant free sample containers. Also the WP should state where the bottles will be stored on-site in order to avoid extraneous contamination prior to use.

4. Equipment rinsate and field blank samples are the same. Demonstrated analyte free water must be poured over cleaned sampling equipment at the start of the day, prior to use, each day decontamination is performed. If enough equipment is on hand to collect all samples with only an initial decontamination event performed, then only one field blank is required to be collected. In addition to duplicates and field blanks, the lab will perform a matrix spike/matrix spike duplicate (MS/MSD) analysis for organics or a MS/MD for inorganics. Verify the sample collection volumes with the lab prior to creating the parameter table.

5. Discuss the source and requirements of the demonstrated analyte free water to be used for the field blank and during step 8 of the specified decontamination procedure.

6. Justify the selection of only metals and semi-volatile analysis of the soil from the excavated area. EPA has not approved the conclusions in the referenced RI Report. Also, justify the testing of only metals in the soil to be used for the backfill.

7. Specify the RCRA characteristic tests that will be performed on the composited stockpile samples. Is a TCLP test also required for the disposal at a TSD facility?

8. Details must be provided regarding the analytical testing laboratory. Provide EPA with the lab name, and if not a current participant in the EPA CLP program, provide that lab's recent state certification for testing the parameters of interest by the methods of interest. In addition, if not currently in the CLP,



provide that lab's set of Standard Operating Procedures for review.

9. Details must be provided regarding the actual sampling procedures to be used. Specify the type of tool, material of composition, how the sample will be collected, and the depth and location of collection.

10. Provide an example of the Chain of Custody Forms. The contractor's name and address must be printed on the form.

11. Data validation must be performed for the organic and inorganic data generated in order to be used for a potential "No Action" ROD. Attachments 3 and 4 are the most current SOPs to be used. The WP must specify who will be performing the data validation effort for this sampling activity.

12. Provide any ARARs or soil clean-up levels that are specific to this removal activity. Verify that the analytical methods chosen have quantitation limits below these levels.

#### Specific Comments

##### I. Objective

"elevated levels of several metals" - What metals and at what concentrations? A better explanation has to be provided of what was found in the Remedial Investigation.

"critical area" - What critical area?

"impacted soils" - Soil in addition to grit pile, how deep? Grit is 1', but impacted soil to what depth?

"disposed off-site" - Disposed or stored?

##### II. Scope of Work

###### A. Mobilization

"Normandy Road" - Where is this relative to Midway Road?

###### B. Excavation and Stockpiling

"impacted soil" - How deep?

"grit pile"... "impacted soil" - The grit and soil should be stockpiled separately, because they may be able to be disposed of separately.



Figure 1

Where is the 10' diameter by 1' grit pile?

Where is Normandy Road in relation to Midway Road?

Will the 4 shaded areas denoting blasting grit also be removed?

C. Sampling and Analysis

"12 soil samples will be taken in the excavated areas to confirm removal of contaminants" - Where in the "excavated areas" will the samples be taken? At the base of excavation after removal? How many of the 12 samples will be for metals vs. semivolatiles.

D. Backfilling

"confirmation sample analyses" - What clean up criteria will be used?



## Attachment 5

1. Section 4.2.1 describes cold stress hazards and controls in detail, however Section 5 of Attachment A details heat stress monitoring. When is this work scheduled to occur? Will heat stress, cold stress or both heat and cold stress present a problem during the course of this work? This should be clarified in the HASP.
2. Table B-2 references tasks associated with a site investigation at the Wayside Area. This HASP is supposed to deal with the hazards associated with the soil contamination removal at Site 20. Table B-2 should be amended accordingly.
3. Many of the chemical hazards listed in Section A of Attachment A cannot be measured with an HNu. Yet no other air monitoring for these contaminants is proposed. How will determinations be made to insure airborne levels of these contaminants are kept below published exposure levels?
4. No contaminant concentration information is presented anywhere in the HASP. This information must be available since a decision was made to remove the soil. This information would be necessary in order to determine action levels and the need to conduct personal air monitoring. The chemical hazard risk analysis should also include information regarding published exposure limits and target organs.
5. The action levels proposed in Section 5.0 do not take into account airborne levels of particulate contaminants. What were these action levels based on?
6. What are the tasks associated with this work? These tasks should be presented consistently throughout the HASP. The tasks presented in Table B-2 and Section F of the Attachment do not coincide.
7. Section 6.2 mentions the collection of septic system samples. Is this going to be part of the scope of work? If so, a task risk analysis would be necessary for this activity. If not, this reference should be removed from the HASP.
8. Section 8 should mandate the washing of respirators at the end of each work day.
9. How can contractors participate in the Navy's medical monitoring program? (See reference in Section 9.0). Shouldn't the contractors be required to have their own program which complies with 29 CFR 1910.120.



10. Section 9.3 references a sign-in sheet that should have been included as Attachment D, but was not.
11. There was supposed to have been a map with directions to the hospital included in the HASP. This map was not included.
12. The hazardous substance forms referenced in Section E of the Attachment were not included.
13. Section F of Attachment A, "Personal Protective Equipment," does not coincide with the information presented in Section 6.0 and 7.0 of the Appendix. This should be rectified. What level of PPE is actually being proposed for each of the tasks to be conducted?
14. Section 3 of the Attachment mentions air sampling for lead and zinc chromate. How will this be done? What methods are to be employed? This information should be provided in Section 5.0 of the Appendix.
15. Section 5.0 mentions oxygen and combustible gas monitoring. However this type of air monitoring is indicated as N/A in Section 3 of the Attachment. This discrepancy should be rectified.
16. Section 2 of the Attachment states that a Lt. Johnson be briefed regarding site operations, hazards, and the substances involved. This should occur prior to the start-up of any site operations and should be documented in some fashion.
17. Where will the front end loader be decontaminated? How will the run off be contained?
18. Any hazardous materials brought on-site need to be included in a Hazard Communication Program. Hazardous waste is exempt from the requirements of 29 CFR 1910.1200. However, hazardous materials brought onto the site for equipment calibration and/or decontamination (i.e., nitric acid, acetone) are covered by this standard. Employees must be trained, materials must be labeled, and the MSDS's for these items must be kept on site.

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19. The HASP should contain, or make reference to, a comprehensive written PPE Program specific to site operations that addresses site hazards, duration of site activity, limitations of PPE during temperature extremes, PPE selection, use, maintenance, storage and inspection.
20. The HASP should provide for monitoring of the decontamination procedures by the Site Health and Safety officer.

