



**FOSTER WHEELER ENVIRONMENTAL CORPORATION**

File #: 1284-0017-98-0072

**TO:** Contracting Officer  
Northern Division  
Naval Facilities Engineering Command  
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Lester, PA 19113  
ATTN: P. Briegel

**FROM:** Mike Heffron, P.G.

**DATE:** February 5, 1998

**SUBJECT:** US NAVY CONTRACT NO. N62472-94-D-0398  
DELIVERY ORDER 0017-MOD. NO. 8  
NAVAL WEAPONS STATION-EARLE  
FINALIZATION OF WORK PLAN FOR SITE 26  
RESPONSE TO COMMENTS

Following are responses to the Navy's comments received from Greg Goepfert. No comments were received from any other parties.

1. **COMMENT: General** - What is the feasibility of steam cleaning the building floor drains before plugging.

**RESPONSE:** As per telephone conversations between Mike Heffron and Greg Goepfert, it was agreed that Foster Wheeler could power wash the four main floor drains inside Building GB-01 and collect the water outside for off-site disposal. As per the conversations, the drains will be sealed with removable plugs which would allow the drains to be reopened easily if the drains are later re-routed to another location.

2. **COMMENT: Page 8, paragraph 3.4** - Please justify why respiratory protection is less than level "A" given levels of vinyl chloride and trichloroethylene previously found.

**RESPONSE:** Level B Respiratory shall be used to complete the site work. Level B respiratory protection, or supplied air, is the highest level of respiratory protection. The Level A protection is a total encapsulating suit for dermal protection, which is not necessary for the contaminants of concern. This issue was also addressed in the Health and Safety Plan.

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3. **COMMENT:** Page 14, Table 4-1 - Why is concrete and decon water not subjected to the same full RCRA scan (TCLP metal and RCRA characteristics) as the sediment/sludge?

**RESPONSE:** The concrete will be disposed as hazardous waste (F001) because of the solvent washing operations, therefore the disposal facilities do not require analytical results for micro or macro-encapsulation. Total organic and metals analysis of the liquid are being performed because liquid wastes (containing less than 0.5% dry solid material) filtered through a 0.6 to 0.8  $\mu\text{m}$  glass fiber filter are defined as the TCLP extract and are analyzed without undergoing the extraction procedure. In effect, the "total" analysis of the sample (after filtration) becomes the TCLP result.

4. **COMMENT:** General - Don't understand why decon water cannot be disposed of on-site to reduce disposal costs (as long as analysis proves "non-hazardous").

**RESPONSE:** The wastes generated thus far at the site have been classified as a "listed waste" with the hazardous waste code F001 due to the past spent solvent disposal operations, therefore any wastes generated from this remediation may be subject to the same waste classification. The decon water generated from this operation should be minimal.

5. **COMMENT:** Page 19, paragraph 5.2.2 - "halogerated" should be "halogenated".

**RESPONSE:** The typographical error was corrected.

6. **COMMENT:** Page 20, paragraph 5.2.3 - Suggest concrete be wetted down prior to collecting chip samples or performing any destructive work on the concrete tank to assure that any energetic/explosive fines are desensitized from friction impact.

**RESPONSE:** Paragraph 5.2.3 was removed since the disposal facility does not require analytical results for the micro-macro encapsulation of F001 wastes. A statement concerning wetting down the concrete prior to any destructive work was included in Section 3.4.