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TRANSMITTAL LETTER FOR THE RESPONSES TO U S NAVY COMMENTS ON
FINALIZATION OF WORK PLAN FOR SITE 26 AIR SPARGING/ SOIL VAPOR EXTRACTION
PILOT STUDY NWS EARLE NJ
4/22/1999
FOSTER WHEELER ENVIRONMENTAL CORPORATION



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TO: Contracting Officer
Northern Division
Naval Facilities Engineering Command
10 Industrial Highway, Mail Stop #82
Lester, PA 19113
Attn: S. Lehman

*Pilot test
conducted
in May 1999*

FROM: Mike Heffron, P.G.

DATE: April 22, 1998⁹

SUBJECT: US NAVY CONTRACT NO. N62472-94-D-0398
DELIVERY ORDER 00034
NAVAL WEAPONS STATION-EARLE
FINALIZATION OF WORK PLAN FOR
SITE 26 AIR SPARGIN/SOIL VAPOR EXTRACTION PILOT STUDY

Following are responses to the Navy's comments received from Greg Goepfert. No other comments were received on the Draft Work Plan.

- 1. **COMMENT: General-** Have RCRA Subpart AA, BB, CC requirements been looked into as an applicable, relevant or appropriate regulation (ARAR) for the operation of the system?

RESPONSE: RCRA Subparts AA, BB, CC have been reviewed to determine if they are ARARs. Based upon review of the regulations, Foster Wheeler Environmental determined that the Subparts AA, BB, CC are not ARARs since the investigative-derived wastes will not be stored for longer than 90 days from the date of accumulation; and there will be control devices on the air discharge that are regulated under 40 CFR part 60, 61 or 63 (Clean Air Act).

- 2. **COMMENT: Page 5, Top Paragraph-** There are several operational potable water wells on the Station; they are: Bldg. FA-2 (which is incidentally 4,000 ft. NE of Site 26), Bldg. S-35 (west of Hwy 34), and a private well with a 300,000 gallon holding tank.

RESPONSE: The last part of the paragraph was changed to state that there are potable water wells on the base, the closest of which is 4,000 feet northeast of Site 26 at Building FA-2.



3. **COMMENT: Page 5, 1st Paragraph-** 0.0045 feet/foot? Please clarify units of groundwater flow.

RESPONSE: These units refer to the horizontal gradient, which was added to the text. The 0.0045 feet per foot is the slope difference per horizontal foot.

4. **COMMENT: Paragraph 3.2-** It is important that the following organizations know when the work will be performed: Base Civil Engineer, Ext. 2317, Explosives Safety, Ext. 2386, Security, Ext. 2291, Ordnance Foreman, Bldg. FA-2: Mr. Frank Massa, Ext. 2091, Fire Dept., Ext. 2260, Safety Dept. 2624, Environ. Div., Ext. 2515 or Ext. 2062.

RESPONSE: This notification information was added to Section 3.2.

5. **COMMENT: General-** What level of personal protective equipment (PPE) will be donned by site workers? Please advise in revised Activity Hazard Analysis.

RESPONSE: The PPE issues were addressed in the revised Activity Hazard Analysis, which will be a supplement to the previously submitted approved HASP for this site. The AHAs are included in this submittal.

6. **COMMENT: Page 11, para. 3.2.1-** What was the format of their approval? Earle did send the NJDEP Air people a letter on 18 Feb. 99, and have not received a reply. Please advise.

RESPONSE: Foster Wheeler Environmental contacted NJDEP in March 1999 to follow up on the request for permission to operate the system, and was told that a check was required for processing. A check was submitted on March 18, 1999, and several follow-up calls were made to NJDEP on the status. A conversation with Bob Darrow of NJDEP on April 22, 1999 indicates that the NJDEP will send out the permission to operate the pilot study system shortly. The text was modified to reflect the fact that the system will not be operated until a letter from NJDEP is received granting the permission to operate the pilot study.

7. **COMMENT: Pg. 23, para. 7.2-** The spent granular activated carbon will be analyzed before disposal at any facility.

RESPONSE: The paragraph was changed to reflect the fact that the carbon will be analyzed prior to shipment to a recycling/disposal facility.

8. **COMMENT: Pg. 25-** Contact Mr. Swalwell at Ext. 2339 to advise him that drums of waste have been generated, and their location.

RESPONSE: This section was changed to add that Mr. Swalwell will be notified of the number of drums generated, and their staging location.