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Letter
Faxed 5/29/94

Hercules Aerospace Company
Allegany Ballistics Laboratory
P. O. Box 210
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(304) 726-5000

May 27, 1994
In Reply Refer To: PBO/94-594

Commander
Department of the Navy
Naval Facilities Engineering Command
Atlantic Division
1510 Gilbert Street
Norfolk, Virginia 23511-2699

Attention: Mr. Jim Szykman

Reference: 1) Funding and Insurance Requirements (PBO/94-0305)
2) Work Plans for Sites 1 and 7

Dear Jim:

Installation Restoration Program at ABL

Hercules Aerospace Company, Allegany Ballistics Laboratory (HAC/ABL) is in receipt of the Navy's comments and position regarding our Reference 1 letter and has referred them to our Legal Department for review. HAC/ABL will respond to the Navy's position under separate cover.

HAC/ABL has reviewed the Reference 2 Work Plans and is providing the comments and concerns discussed below.

Much of the work planned for Site 1 will be done within or adjacent to ABL's active burning ground, and will have to be scheduled around our operating requirements for use of the area. Active operations are normally conducted between 9:30 am and 1:30 pm daily (weekdays), weather permitting, with actual burns occurring from approximately 10:00 - 10:40 and 1:00 - 1:20. Access and work will be restricted during active burning operations for safety reasons. We should be able to coordinate with the Site 1 contractor (CH2MHill) to suspend operations for one day at a time occasionally, but it must be realized that ongoing operational needs will take precedence over RI activities. CH2MHill may wish to schedule split shifts, shift work beginning at approximately 1:30, and/or weekend shifts to most efficiently prosecute their work.

HAC/ABL takes exception to the draft Investigation Derived Waste Management Plan, which assigns HAC/ABL certain responsibilities for the labeling, storage, manifesting, and shipping of IDW. HAC/ABL will accept no responsibility or liability for IDW without a properly executed contractual arrangement with suitable funding to cover costs. In this regard, specific comments on the draft IDW Management Plan are provided on the attached Table.

HAC/ABL notes that the Site Health & Safety Plan for Site 7 specifies that respirators will not be worn unless it is determined that a beryllium inhalation hazard exists. HAC/ABL suggests that the safer, proactive approach, would be to specify the wearing of respirators until it is determined that a beryllium inhalation hazard does not exist.

Please refer all questions to the undersigned at 304-726-5533.

Sincerely,

Mark W. Stewart
Facilities Contract Administrator

cc: Mr. S. G. Hoffman, NAVSEA Code 0713

HI/ABL COMMENTS

DRAFT IDW MANAGEMENT PLAN FOR SITE 1

PAGE	PARA	COMMENT
1-1	5	Labeling and storage should be the subcontractors responsibility ABL can provide inspection and audit functions with contractual/funding arrangement ABL can manifest and ship for disposal only with contractual/funding arrangement
1-7	1	The PM should label containers as necessary, with assistance from the facility
1-7	2	The FTL should prepare waste record sheet for any waste determined to be RCRA hazardous
1-7	5	If waste is determined to be hazardous, the PM should arrange movement to Building 366 the facility hazardous waste storage pad
		HAC/ABL should be responsible only for storage of hazardous waste at Building 366, and for shipment to permitted TSD facilities, provided a proper contractual arrangement for such services is executed.