

A3. SWMU B-3 REMOVAL ACTION ADDENDUM, TASK ORDER 06

A removal action will be performed to remove impacted media and waste located at SWMU B-3 to remove potential sources of chlorinated hydrocarbons that have contaminated the underlying aquifer. The methodology and removal action procedures are described in the respective workplan [(CSSA, 2006)<hyperlink>]. Background information on SWMU B-3 can be found in the RFI Work Plan Addendum for SWMU B-3, dated January 2006 (Volume 3-1 of the CSSA Environmental Encyclopedia). Specific activities associated with this RFI/IM WMP and planned RFI/IM Waste/Contaminated Media Management is associated with this addendum.

The removal action for SWMU B-3 will include temporary stockpile areas, silt fencing for sediment control, and storm water diversion berms constructed as required for the work. The exact location of these features will be field-determined, but will remain within the SWMU B-3 delineated area. The SWMU B-3 delineated area is shown in Figure A3-1.

Prior to excavation, the existing SVE system will be dismantled. CSSA will remove the power to the SVE and disconnect electrical utilities, leaving all underground electrical utilities dead. Parsons will salvage the blower and remove above ground piping as needed.

Once the SVE system has been removed, the upper soil cover and debris-free overburden will be removed and stockpiled nearby for future use as fill or top soil. For the media excavated from SWMU B-3, waste characterization sampling will occur at a frequency rate of 1 TCLP sample per 200 CY of media/waste for VOCs, and metals, and for total petroleum hydrocarbons (TX 1005).

Ordnance material was discovered in the SWMU B-3 area during the first week of commencing removal actions, causing the excavation activities to be temporarily halted to revise the safety and sampling protocols for completing the removal actions. With the identification of UXO in the material, excavation activities will be supervised by UXO technicians to provide UXO identification and avoidance for the workers and equipment performing the removal action activities and to address safety issues associated with ordnance material. Soil will be stockpiled and staged in 200 CY lots for sampling purposes. Each 200 CY lot of excavated soil which contains any UXO items will be sampled for total explosives (SW 846 Method 8330) and TCLP SVOCs, in addition to total TPH and TCLP VOCs and TCLP metals. At a minimum, at least 10% of 200 CY lots will be tested for TCLP SVOC and total explosives analyses. Scrap inert ordnance-related metal items recovered during investigations will be recycled.

Each of the trench's contents and contaminated soils will be removed and placed in stockpile areas for eventual off-post disposal. The following segregated stockpile areas will be constructed based on analytical data and field screening assessments:

- Hazardous Material Stockpile,
- Nonhazardous Material Stockpile,
- Debris-free overburden soil,
- Unknown Material Stockpile, and
- Scrap Stockpile.

The nonhazardous material stockpile area will be bermed to divert run-on and to prevent run-off from the piles. Materials will be segregated based on the characterization performed during the RFI and Photo-ionization detector (PID) readings taken during excavation. Metal debris that is deemed recyclable will be segregated into a scrap stockpile. Suspected hazardous or unknown materials will be segregated into separate stockpiles. The trench contents and impacted soil will be excavated to bedrock. Surveys of the excavation and stockpile will be made on a routine basis to document the volume of soil excavated and those designated for disposal. It is anticipated that as much as 22,000 CY of excavated materials will require some form of management.

CSSA will utilize the Area of Contamination concept in managing and treatment of contaminated media or waste. Treatment efforts will include the stabilization of hazardous inorganic impacted media *in situ* before generation, thus rendering the media non-hazardous before disposal. Additionally, management of remediation waste will follow USEPA guidance in a memorandum issued on October 14, 1998, Management of Remediation Waste Under RCRA, EPA 530-F-98-026.

All removal work will be performed in Level D personal protective equipment. The excavated material will be handled and disposed as determined by waste characterization testing. Sampling methodology and quality control are described in the SAP addenda (**Draft SWMU B-3 Treatability Study Work Plan, Parsons, dated December 2005**).



Aerial Photo Date: 2003



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Figure: A3-1
SWMU B-3
Camp Stanley Storage Activity
PARSONS