B-3

FOSTER WHEELER ENVIRONMENTAL CORPORATION

July 10, 2002
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Mr. Paul Baker
Pacific Environmental
5001 S. Miami Blvd., Suite 300
Durham, NC 27703

Subject: AFCEE Contract No. F41624-00-D-8025, Delivery Order 23
Camp Stanley Storage Activity, Work Plan Addendum for Solid Waste Management Unit B-3

Ref: CDRL A014

Dear Mr. Baker:

Enclosed is a copy of the final DO-23 Work Plan Addendum.

Should you have any questions regarding the Work Plan, please call me at 281-597-4821.

Sincerely,

Frank Frey by BrEMl

Frank P. Frey,
Houston Operations Manager

FF/da

Enclosure

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DO 23 Work Plan Addendum for Solid Waste Management Unit B-3 Camp Stanley Storage Activity, Texas

Introduction

This Work Plan Addendum modifies *Volume 1-1: Work Plan* of the Camp Stanley Storage Activity (CSSA) Environmental Encyclopedia to address work that Foster Wheeler Environmental Corporation (Foster Wheeler Environmental) will perform under the Air Force Center for Environmental Excellence (AFCEE) Contract No. F41624-00-D-8025, Delivery Order (DO) 23. The majority of the work is related to the assessment and closure of Solid Waste Management Unit (SWMU) B-3 at CSSA. A small portion of the work is related to the post-wide Environmental Management System (EMS) for CSSA.

The Work Plan Addendum addresses the following tasks:

- Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) for SWMU B-3
- Interim Remedial Action (IRA) at SWMU B-3
- Technology Evaluation
- Environmental Management System

Each task is addressed in the following sections.

RCRA Facility Investigation

Sufficient historical data are available to adequately determine the nature and extent of contamination at SWMU B-3. No RFI field activities will be performed and no additional samples will be collected to characterize the site.

Interim Remedial Action

An IRA will be performed to remove soils at SWMU B-3 to achieve closure of the soil unit under Texas Risk Reduction Rules, Standard Number1. The closure methodology and procedures are described in Volume 1-1, Section 2. Background information on SWMU B-3 can be found in the RL74 and RL83 RFI Work Plan Addendum for SWMU B-3 dated August 1999 (Volume 3-1 of the CSSA Environmental Encyclopedia).

Health and Safety Requirements

It is anticipated that all activities associated with the IRA fieldwork will be conducted in modified Level D. Continuous air monitoring using a photoionization detector (PID) or flame ionization (FID) will be performed during all intrusive activities. Tyvek suits and chemically resistant gloves and boots will be required for site workers during intrusive activities and handling of waste. However, air-purifying respirators should be on-post and ready to use if it deemed necessary by the site Health and Safety Officer.

All workers will be assigned the necessary personal protective equipment (PPE), respirators, and cartridges prior to the start of work. . All persons entering the work area will be required to attend an initial site-specific health and safety meeting (approximately 45 minutes) before mobilizing any equipment or performing any work on the site property and a weekly health and

safety meeting (approximately 15 minutes). In addition, all persons entering the work area for any reason will be required to provide proof of Occupational Safety and Health Act (OSHA) Hazardous Waste Operations (HAZWOPER) training, including current annual refresher updates and current medical clearance for work at a hazardous waste site signed by a licensed physician. (CSSA oversight personnel do not require a physical). These certificates will be forwarded to Foster Wheeler Environmental prior to mobilization to the site. There will be no exceptions.

Mobilization, Site Preparation, and SVE Demolition

Foster Wheeler Environmental will mobilize equipment and personnel to CSSA to perform the IRA. CSSA will provide guidance as needed through the Environmental Office and in the field. Temporary stockpile areas, silt fencing for sediment control, and stormwater diversion berms will be constructed as required for the work. The exact location of these features will be determined in the field.

Prior to excavation, the existing soil vapor extraction (SVE) system will be dismantled. CSSA will disconnect the power to the SVE system, unhooking the electrical utilities so that all underground electrical utilities are dead. Parsons will salvage the blower and remove aboveground piping as needed. The SVE system layout is shown in Figure 2.1 of Volume 4 of the CSSA Environmental Encyclopedia, the Second Addendum to SVE Test Work Plan for SWMU B-3 dated December 1999.

Traffic Control

Figure 1 provides the traffic routes to be used during the IRA. Routine traffic, including site personnel, will enter through Gate 2, which is the main gate. Trucks hauling waste materials and backfill will enter through Gate 5 and use the North Outer Road to access and exit the SWMU B-3 project site.

Unexploded Ordnance Avoidance

Unexploded ordnance (UXO) is not expected to be encountered in SWMU B-3; however, site personnel will remain alert for any signs of UXO, especially during excavation. There is potential for encountering ammunition cans during excavation. Should ammunition cans or other evidence of UXO be uncovered, a post Quality Assurance Specialist (QUAS) will be contacted to inspect the materiel. Upon clearance, excavation work will resume. Should the post QUAS determine that UXO is present, work will be suspended until an approach to manage the UXO is developed. As necessary, a post representative will certify that waste is free of UXO prior to off-post disposal.

Stormwater Management

To mitigate the need to manage stormwater, the IRA will be performed during the summer months when precipitation is generally low. A stormwater diversion berm will be placed uphill of SWMU B-3 to reduce run-on to the site.. Silt fencing will be used to control sediment.

Excavation

After site preparation is complete, Foster Wheeler Environmental will excavate materials from SWMU B-3 and segregate the materials into separate stockpiles. Four stockpile areas will be constructed based on analytical data and field screening assessments:

- Clean Stockpile (cover materials)

- Non-hazardous Class 1 waste stockpile
- Non-hazardous Class 2 waste stockpile
- Scrap stockpile

Once the SVE system has been removed, Foster Wheeler Environmental will strip the upper soil cover from the west trench and stockpile it nearby for future use as fill or topsoil. Foreign matter will be removed from the stockpile before it is used as backfill material or it will be disposed of off-post as appropriate. The Clean Fill stockpile will be sampled every 250 loose cubic yards (LCY) and analyzed for volatile organic compounds (VOCs) and metals. A single composite sample will be collected for analysis of semivolatile organic compounds (SVOCs) and mercury. Analytical results will be compared to background criteria to determine the suitability of the material as top soil or fill. Material exceeding background criteria will be disposed off-post; materials complying with background criteria will be used as top soil or fill. Sampling and analysis requirements are given in Table 1 and the Sampling and Analysis Plan (SAP) Addendum. Background criteria are given in Tables 2, 3 and 4 for metals, VOCs, and SVOCs, respectively.

The contents and contaminated soils from each trench will be removed and placed in lined stockpile areas for eventual off-post disposal. The approximate limits of excavation are given in Figure 2. These limits may be expanded to achieve background concentrations based on the results of confirmation sampling.

The Class 1 and Class 2 waste stockpile areas will be lined with 20-mil plastic and bermed to divert run-on. Materials will be segregated based on historical analytical data, appearance and PID readings taken during excavation. The SVE area, which has historically shown the highest concentrations of contaminants of concerns (COCs), will be demarcated prior to excavation and receive additional scrutiny as materials are segregated. Waste materials that can be identified visually, such as ash or burned materials, and soil with excessive PID/FID readings will be segregated as Class 1 waste. Soil removed from the trench and relatively free of waste materials will be segregated into the Class 2 waste stockpile. Metal debris that is easily segregated and deemed recyclable will be placed into a scrap stockpile. 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 the volume designated for disposal.

Waste Management

Grab samples will be collected from the Class 1 and Class 2 waste stockpiles as listed in Table 1 and the SAP Addendum. Samples from the Class 1 and Class 2 stockpiles will be analyzed for total petroleum hydrocarbon (TPH) and Toxicity Characteristic Leaching Procedure (TCLP) VOCs and metals to confirm the waste characterization prior to shipment off-post. One sample for every 500 LCY will be tested to classify waste. After classification, material in the stockpiles will be transferred to end dumps for transport to a disposal facility. Foster Wheeler Environmental will prepare waste documentation and a designated post representative will sign all waste documentation.

As stated earlier, grab samples of the clean soil stockpile will be collected once every 250 LCY and analyzed for VOCs and metals for comparison to background criteria. A single composite sample will be collected for analysis of SVOCs. If concentrations are found to be at or below background concentrations, the clean soil will be used as topsoil or general fill. If concentrations are above background criteria, the stockpile may be re-sampled or disposed as Class 1 or Class 2

waste, depending on analytical results. Background criteria are given in Tables 2, 3 and 4 for COC metals, VOCs, and SVOCs, respectively.

Metal debris that is easily segregated and deemed recyclable will be separated from bulk soil and waste, then placed in a roll-off container for eventual recycling off-post. Debris that cannot be easily segregated or is not considered recyclable will be disposed off-post as appropriate.

Confirmation Sampling

Grab confirmation samples will be collected from sidewalls of the excavation every 100 linear feet and analyzed for VOCs and metals to confirm clean closure. Approximately 16 sidewall samples are expected to be collected. For analysis of SVOCs, one composite sample will be collected from each sidewall for each trench (eight total) rather than every 100 linear feet. Locations of confirmation samples are given in Figure 2. These samples will be subjected to 100 percent verification and 100 percent validation. A survey will be performed prior to backfilling to document the sample location and the limits of excavation.

Analytical results will be compared to background criteria to determine compliance. Background criteria are given in Tables 2, 3 and 4 for COC metals, VOCs, and SVOCs, respectively. If the results exceed background criteria, additional material may be removed for disposal or additional confirmation sampling may be performed. If additional excavation is performed, an additional 3 to 5 feet of material will be removed at the sample location exceeding background. The excavation will be tapered back to the closest sample locations for which analytical results show that concentrations do not exceed background criteria. An example of the approach is illustrated in Figure 3.

Backfill and Seeding

Once the confirmation samples show that clean closure has been achieved , the excavation will be backfilled with clean fill from an approved borrow source. One representative soil sample from the proposed borrow source will be collected and analyzed for metals, VOCs, SVOCs and mercury. The results will be compared to background criteria established for on-post soil. Table 1 is a sample matrix detailing the analytical work to be performed. Borrow sources must be shown to be at or below background criteria prior to delivery to the post. Background criteria are given in Tables 2, 3 and 4 for metals, VOCs, and SVOCs, respectively. The clean backfill material will be covered with the overburden that was removed and stockpiled earlier, if the material is shown to be at or below background by analysis. The site will then be graded to match surrounding terrain and seeded with native vegetation.

Surveying

Foster Wheeler Environmental will use the Leica SR530 Global Positioning System/Differential Global Positioning System (GPS/DGPS), or equivalent, establish the coordinates and elevation of sample locations, perform topographic surveys of SWMU B-3, and provide survey controls and as-built drawings during IRA. One unit will be positioned over a surface location with known coordinates (base station), and the other unit (rover) will be positioned at the survey location to be surveyed. Positional data acquired in this manner can be post-processed to provide the location of the rover GPS antenna within 2 centimeters (cm) in kinematic mode (moving observations) and less than 1 cm in static mode.

An electronic copy of the GPS survey results for the site will be provided in AutoCAD format for topographic surveys, as-builts, and sample locations. Raw data from the GPS unit will be provided in a spatial data system structure compatible with the CSSA GIS.

RFI/IRA Report

The RFI/IRA report will reference previous studies used in lieu of conducting RFI field work and document attainment of Risk Reduction Standard Number 1 in accordance with 30 TAC §335.554 (relating to attainment of Risk Reduction Standard 1). The report will include:

- Descriptions of procedures and conclusions of the RFI and IRA
- Basis for selecting environmental media of concern
- Descriptions of removal procedures performed in closure, including as-built drawings
- Summaries of sampling methodology and analytical results that demonstrate compliance with background criteria.

Technology Evaluation

An evaluation of the commercially available and emerging technologies and other project enhancement technologies will be performed for pertinent remedial treatment options for the groundwater and vadose zones. The evaluation and final report will consider:

- Effectiveness
- Implementability
- Cost factors (i.e., capital costs and operation and maintenance)
- Estimated cleanup time
- Results obtained during the RFI and IRA

The report will include a recommendation that will take into account cost, cleanup time, effectiveness, public acceptance, and technical risk. The final recommendation will be used to identify promising technologies for further evaluation.

A draft report will be submitted within 30 days of the completion of IRA field activities. A final report will be submitted within 20 days of resolution of CSSA and AFCEE comments.

Environmental Management System

Foster Wheeler Environmental will perform a needs analysis for a post-wide EMS. The work will be limited to a Needs Assessment.

The Needs Assessment will accomplish the following objectives:

1. Identify the Environmental, Safety, and Health (ESH) processes/systems currently in place at CSSA.
2. Identify conformance gaps between the existing processes/systems and the requirements of Executive Order (EO) 13148 (and other, relevant, agency specific guidance).

The Needs Assessment will involve several steps. First, a baseline summary of current ESH operations and processes will be developed. The baseline will be developed from interviews with selected CSSA personnel and observations of selected CSSA activities, using the requirements of EO 13148 and relevant EPA, OSHA, and Army-specific guidance as a starting point for identifying relevant ESH processes/systems. The baseline will summarize the existing processes and systems used by CSSA to manage (e.g., obtain, manipulate, communicate, and store) ESH

information. The baseline summary will be provided to CSSA personnel for review and validation. Following validation of the baseline, a focused questionnaire will be developed and distributed to potential system users to survey ESH data management needs. Foster Wheeler Environmental, in coordination with CSSA, will review findings of the survey and target specific individuals for in-depth interviews. The interviews will focus on how these personnel manage ESH information.

On-post interviews will be performed with selected individuals from the following functional groups:

- Environmental Managers
- Health and Safety Managers
- Shop Managers
- Contracting Manager
- Commander

Based on a comparison of the interview findings with the requirements of EO 13148 and relevant organization guidance, critical ESH decision-making processes/systems and potential gaps in the existing processes/systems will be identified. The resultant identification of critical processes/systems (and gaps in the existing ESH processes/systems) will provide CSSA with the basis for achieving EMS conformance.

The Final Report will outline CSSA's specific needs for achieving conformance with EMS requirements specified in EO 13148 and other, relevant organization specific guidance. A draft submittal of the report will be provided to CSSA for review. Comments to the draft will be addressed and the report revised (as necessary)within 30 days of receipt of comments.

Schedule

Foster Wheeler Environmental anticipates that the work associated with this DO will require 12 months—May 2002 to May 2003. Fieldwork for the IRA is scheduled for July 15, 2002, and is expected to last 1 month. The EMS Needs Analysis and IRA Closure Report will be initiated after completion of the IRA fieldwork.

TABLE 1: Analytical Matrix

Parameter	Borrow Samples[1]			Closure Certification[2]				Characterization Samples						GRAND TOTAL
	Borrow Source	Trip Blanks	Total	Soil	Soil QC	Trip/ Rinse Blanks	Total	Clean Soil[1] 1,620 LCY	Class 1 Pile[3] 4,320 LCY	Class 2 Pile[3] 4,860 LCY	Soil QC	Trip Blanks	Total 10,800 LCY	
COC Organics														
VOCs, SW8260B	1	1	2	16	4	4/2	26	7			3	1	11	39
SVOCs, SW8270C	1		1	8	3	2	13	1			2		3	17
COC Metals:														
Arsenic, SW6020	1		1	16	4	2	22	7			3		10	33
Barium, SW6020	1		1	16	4	2	22	7			3		10	33
Cadmium, SW6020	1		1	16	4	2	22	7			3		10	33
Chromium, SW6020	1		1	16	4	2	22	7			3		10	33
Copper, SW6020	1		1	16	4	2	22	7			3		10	33
Lead, SW6020	1		1	16	4	2	22	7			3		10	33
Nickel, SW6020	1		1	16	4	2	22	7			3		10	33
Zinc, SW6020	1		1	16	4	2	22	7			3		10	33
Mercury, SW7471A	1		1	--	--	--	--	1			2		3	4
Waste Analysis														
TPH, TNRCC 1005 r 3									9	10			19	19
TCLP – VOCs, 1311/8260B									9	10			19	19
TCLP - Texas List Metals 1311/6010B/7478									9	10			19	19

NOTES:

1. 21-day Turn-Around Time
2. 3-day Turn-Around Time
3. 7-day Turn-Around Time
4. "SW" refers to SW-846 Test Methods for Evaluating Solid Waste.
5. All samples are soil or waste; no samples of rock will be collected.
6. Sample from borrow source is a single grab sample for VOCs and one composite sample for the remaining parameters.
7. Closure certification samples for VOCs and metals are grab samples collected at a frequency of one sample every 100 feet along the side wall of the excavation.
8. Closure certification samples for SVOCs are composite samples collected from each sidewall of the excavation.
9. Closure certification samples require field duplicates, MS/MSD, trip blanks and equipment rinse blanks.
10. Grab samples of clean soil stockpile are collected once every 250 LCY for VOCs and metals; a single composite is collected for SVOCs and mercury. Field duplicates, MS/MSD, and trip blanks are required.
11. Grab samples of Class 1 and Class 2 stockpiles are collected once every 500 CY.
12. Texas List Metals consist of antimony, arsenic, barium, beryllium, cadmium, chromium, lead, mercury, nickel, selenium, and silver.

TABLE 2: CSSA Background Concentrations for Metals in Soil

Parameter	Concentration (mg/kg)
Arsenic	19.60
Barium	186.00
Cadmium	3.00
Chromium	40.20
Copper	23.20
Lead	84.50
Mercury	0.77
Nickel	35.50
Zinc	73.20

TABLE 3: CSSA Background Concentrations for Volatile Organics in Soil

(based on reporting limits for SW8260B in AFCEE QAPP v. 3.1)

Analyte	Soil	
	Limit	Unit
1,1,1,2-Tetrachloroethane	0.003	mg/kg
1,1,1-TCA	0.005	mg/kg
1,1,2,2-Tetrachloroethane	0.003	mg/kg
1,1,2-TCA	0.005	mg/kg
1,1-DCA	0.005	mg/kg
1,1-DCE	0.006	mg/kg
1,1-Dichloropropene	0.005	mg/kg
1,2,3-Trichlorobenzene	0.005	mg/kg
1,2,3-Trichloropropane	0.005	mg/kg
1,2,4-Trichlorobenzene	0.005	mg/kg
1,2,4-Trimethylbenzene	0.006	mg/kg
1,2-DCA	0.003	mg/kg
1,2-DCB	0.005	mg/kg
1,2-Dibromo-3-chloropropane	0.01	mg/kg
1,2-Dichloropropane	0.005	mg/kg
1,2-Dibromoethane (EDB)	0.005	mg/kg
1,3,5-Trimethylbenzene	0.005	mg/kg
1,3-DCB	0.006	mg/kg
1,3-Dichloropropane	0.002	mg/kg
1,4-DCB	0.002	mg/kg
1-Chlorohexane	0.005	mg/kg
2,2-Dichloropropane	0.005	mg/kg
2-Chlorotoluene	0.005	mg/kg
4-Chlorotoluene	0.005	mg/kg
Acetone	0.05	mg/kg
Benzene	0.002	mg/kg
Bromobenzene	0.005	mg/kg
Bromochloromethane	0.005	mg/kg
Bromodichloromethane	0.002	mg/kg
Bromoform	0.006	mg/kg
Bromomethane	0.01	mg/kg
Carbon tetrachloride	0.005	mg/kg
Chlorobenzene	0.002	mg/kg
Chloroethane	0.005	mg/kg
Chloroform	0.002	mg/kg
Chloromethane	0.005	mg/kg
Cis-1,2-DCE	0.005	mg/kg
Cis-1,3-Dichloropropene	0.003	mg/kg
Dibromochloromethane	0.003	mg/kg
Dibromomethane	0.005	mg/kg
Dichlorodifluoromethane	0.005	mg/kg
Ethylbenzene	0.005	mg/kg
Hexachlorobutadiene	0.003	mg/kg
Isopropylbenzene	0.005	mg/kg

Analyte	Soil	
	Limit	Unit
Methylene chloride	0.005	mg/kg
Methyl t-butyl ether (MTBE)	0.02	mg/kg
MEK (2-Butanone)	0.02	mg/kg
MIBK (methyl isobutyl ketone)	0.02	mg/kg
n-Butylbenzene	0.005	mg/kg
n-Propylbenzene	0.005	mg/kg
m,p-Xylene	0.005	mg/kg
Naphthalene	0.005	mg/kg
o-Xylene	0.005	mg/kg
p-Isopropyltoluene	0.006	mg/kg
Sec-Butylbenzene	0.005	mg/kg
Styrene	0.005	mg/kg
TCE	0.005	mg/kg
Tert-Butylbenzene	0.005	mg/kg
Tetrachloroethene	0.005	mg/kg
Toluene	0.005	mg/kg
Trans-1,2-DCE	0.005	mg/kg
Trans-1,3-Dichloropropene	0.005	mg/kg
Trichlorofluoromethane	0.005	mg/kg
Vinyl chloride	0.005	mg/kg

NOTE: Shading indicates compound was detected in site samples.

TABLE 4: CSSA Background Concentrations for Semivolatile Organics in Soil

(based on reporting limits for SW8270C in AFCEE QAPP v. 3.1)

Analyte	Soil	
	Limit	Unit
1,2,4-Trichlorobenzene	0.7	mg/kg
1,2-DCB	0.7	mg/kg
1,3-DCB	0.7	mg/kg
1,4-DCB	0.7	mg/kg
2,4-DNT	0.7	mg/kg
2,6-DNT	0.7	mg/kg
2-Chloronaphthalene	0.7	mg/kg
2-Methylnaphthalene	0.7	mg/kg
2-Nitroaniline	3.3	mg/kg
3-Nitroaniline	3.3	mg/kg
3,3'-Dichlorobenzidine	1.3	mg/kg
4-Bromophenyl phenyl ether	0.7	mg/kg
4-Chloroaniline	1.3	mg/kg
4-Chlorophenyl phenyl ether	0.7	mg/kg
4-Nitroaniline	3.3	mg/kg
Acenaphthylene	0.7	mg/kg
Acenapthene	0.7	mg/kg
Anthracene	0.7	mg/kg
Benz (a) anthracene	0.7	mg/kg
Benzo (a) pyrene	0.7	mg/kg
Benzo (k) fluoranthene	0.7	mg/kg
Benzo (b) fluoranthene	0.7	mg/kg
Benzo (g,h,i) perylene	0.7	mg/kg
Benzyl alcohol	1.3	mg/kg
Bis (2-chloroethoxy) methane	0.7	mg/kg
Bis (2-chloroethyl) ether	0.7	mg/kg
Bis (2-chloroisopropyl) ether	0.7	mg/kg
Bis (2-ethylhexyl) phthalate	0.7	mg/kg
Butyl benzylphthalate	0.7	mg/kg
Chrysene	0.7	mg/kg
Di-n-butylphthalate	0.7	mg/kg
Di-n-octylphthalate	0.7	mg/kg
Dibenz (a,h) anthracene	0.7	mg/kg
Dibenzofuran	0.7	mg/kg
Diethyl phthalate	0.7	mg/kg
Dimethly phthalate	0.7	mg/kg
Fluoranthene	0.7	mg/kg
Fluorene	0.7	mg/kg
Hexachlorobenzene	0.7	mg/kg
Hexachlorobutadiene	0.7	mg/kg
Hexachloroethane	0.7	mg/kg
Indeno (1,2,3-cd) pyrene	0.7	mg/kg
Isophorone	0.7	mg/kg
n-Nitrosodiphenylamine	0.7	mg/kg
n-Nitrosodi-n-propylamine	0.7	mg/kg
Naphthalene	0.7	mg/kg
Nitrobenzene	0.7	mg/kg

Analyte	Soil	
	Limit	Unit
Phenanthrene	0.7	mg/kg
Pyrene	0.7	mg/kg
2,4,5-Trichlorophenol	3.3	mg/kg
2,4,6-Trichlorophenol	0.3	mg/kg
2,4-Dichlorophenol	0.3	mg/kg
2,4-Dimethylphenol	0.3	mg/kg
2,4-Dinitrophenol	3.3	mg/kg
2-Chlorophenol	0.3	mg/kg
2-Methylphenol	0.3	mg/kg
2-Nitrophenol	0.3	mg/kg
4,6-Dinitro-2-methylphenol	3.3	mg/kg
4-Chloro-3-methylphenol	1.3	mg/kg
4-Methylphenol	2.0	mg/kg
4-Nitrophenol	1.6	mg/kg
Benzoic acid	5.0	mg/kg
Pentachlorophenol	3.3	mg/kg
Phenol	0.3	mg/kg

NOTE: Shading indicates compound was detected in site samples.