

Fort Devens
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ACTION MEMORANDUM
REMOVAL ACTION
STUDY AREA 32
(DEFENSE RE-UTILIZATION AND MARKETING OFFICE STORAGE YARD)
FORT DEVENS, MASSACHUSETTS

Final

October 1992

Prepared by:

United States Army Toxic and
Hazardous Materials Agency

**ACTION MEMORANDUM, STUDY AREA 32
FORT DEVENS, MASSACHUSETTS**

TABLE OF CONTENTS

Section	Title	Page Number
I.	PURPOSE	1
II.	SITE CONDITIONS AND BACKGROUND	1
	A. SITE DESCRIPTION	1
	B. OTHER ACTIONS TO DATE	4
	C. STATE AND LOCAL AUTHORITIES' ROLE	5
III.	THREATS TO HUMAN HEALTH OR WELFARE OR THE ENVIRONMENT AND STATUTORY OR REGULATORY AUTHORITY	5
	A. THREATS TO HUMAN HEALTH	6
	B. THREATS TO THE ENVIRONMENT	7
IV.	ENDANGERMENT DETERMINATION	8
V.	EXEMPTION FROM STATUTORY LIMITS	8
VI.	PROPOSED ACTIONS AND ESTIMATED COSTS	8
	A. PROPOSED ACTION	8
	B. ESTIMATED COSTS	10
VII.	OUTSTANDING POLICY ISSUES	10
VIII.	EXPECTED CHANGE IN THE SITUATION SHOULD NO ACTION BE TAKEN OR ACTION DELAYED	10
IX.	ENFORCEMENT	10
X.	RECOMMENDATION	11
	GLOSSARY OF ACRONYMS	12

ACTION MEMORANDUM, STUDY AREA 32
FORT DEVENS, MASSACHUSETTS

LIST OF FIGURES

Figure	Title	Page Number
1.	FORT DEVENS	3
2.	LOCATION OF SA 32	4
3.	APPROXIMATE LOCATION OF SCRAP PILES	5

I. PURPOSE

The purpose of this Action Memorandum is to document the decision to perform a removal action at Study Area (SA) 32 at Fort Devens Massachusetts. This Action Memorandum identifies a removal action to address potential sources of hazardous materials or pollutants or contaminants within the scrap piles at the Defense Re-utilization and Marketing Office (DRMO) storage yard.

II. SITE CONDITIONS AND BACKGROUND

The National Contingency Plan (NCP) states that a removal action may be conducted at a site when a threat to human health or the environment is determined. An appropriate removal action is undertaken to abate, minimize, stabilize, mitigate, or eliminate the release or threat of release at a site.

The following subsections provide a physical description of Fort Devens and SA 32 and information on the characteristics of SA 32.

A. SITE DESCRIPTION

1. Removal Site Evaluation

Fort Devens is located in the State of Massachusetts approximately 35 miles northwest of the City of Boston. Fort Devens is located within the towns of Ayer, Harvard Lancaster, and Shirley and comprises approximately 9,280 acres of land area. Since 1917, Fort Devens has been used for a variety of training missions. The current mission of Fort Devens is to command and train its assigned units and support various tenant activities.

On November 21, 1989, Fort Devens was placed on the National Priorities List (NPL) under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) as amended by the Superfund Amendments and Reauthorization Act (SARA). In addition, under Public Law 101-510, the Base Realignment and Closure (BRAC) Act of 1990, Fort Devens was selected for cessation of operations and closure.

During development of the Master Environmental Plan (MEP) and the Enhanced Preliminary Assessment (PA), 59 SAs were identified. SA 32 was labeled as the "DRMO Yard".

Investigations at the DRMO Yard (SA 32) have included studies by the U.S. Army Environmental Hygiene Agency (USAEHA) and a Site Investigation (SI) under CERCLA. The USAEHA study showed PCB contamination in the pavement area. The SI showed petroleum-derived hydrocarbon compounds along with inorganic compounds and pesticide

and Polychlorinated Biphenyls (PCB) contamination in the surface soils outside of the fence.

2. Physical Location and Site Characteristics

SA 32 is the DRMO Storage Yard. It is located north of Antietam Street and the two yards are divided by Cook Street, in the northeast corner of the Main Post area. (Figure 1 and Figure 2). The site is used as a storage area for various items before they are disposed of, either by sale to the general public or by sale as scrap materials. The site is not permitted to store or dispose of hazardous waste. Of particular concern is past storage and disposal of items that contained PCBs and petroleum related compounds. The removal described in this memorandum involves the clean up and disposal of a large pile of scrap and numerous individual items in the northern portion of the east yard (Figure 3).

3. Release or Threatened Release into the Environment of a Hazardous Substance, or Pollutant or Contaminant

The scrap piles and individual items stored in the area may act as a source of contamination of various hazardous substances and/or pollutants. The materials are distributed throughout the yard, and rainfall and snow melt could potentially mobilize contaminants, which could subsequently be released onto the underlying and surrounding soil. The contamination could then infiltrate through the underlying soil into the groundwater under the site, which is believed to be relatively shallow. Thus, the scrap piles may serve as a potential source of both soil and groundwater contamination.

During 1991, USAEHA performed a study of the asphalt pavement in the area. The pavement showed elevated levels of PCB, up to 1640 ppm (parts per million). This contamination was interpreted to be the result of a PCB spill that occurred in 1988. The concern is that the scrap that is proposed to be removed under this removal action may also be contaminated through movement across storage areas and possible mixing with other PCB contaminated materials.

Also during 1991, a SI under CERCLA was initiated at this site. The SI will be completed in final form in January 1993. The field work for the SI was accomplished during 1991, and showed elevated levels of Total Petroleum Hydrocarbons, Inorganic compounds, and Pesticides and PCBs. Again, the concern is that the scrap that is

FIGURE 1, FORT DEVENS

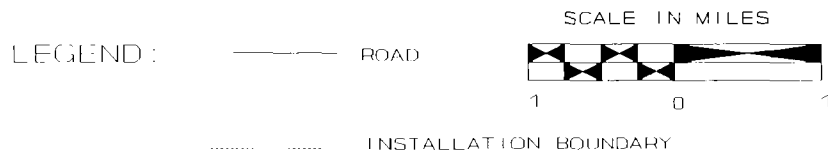
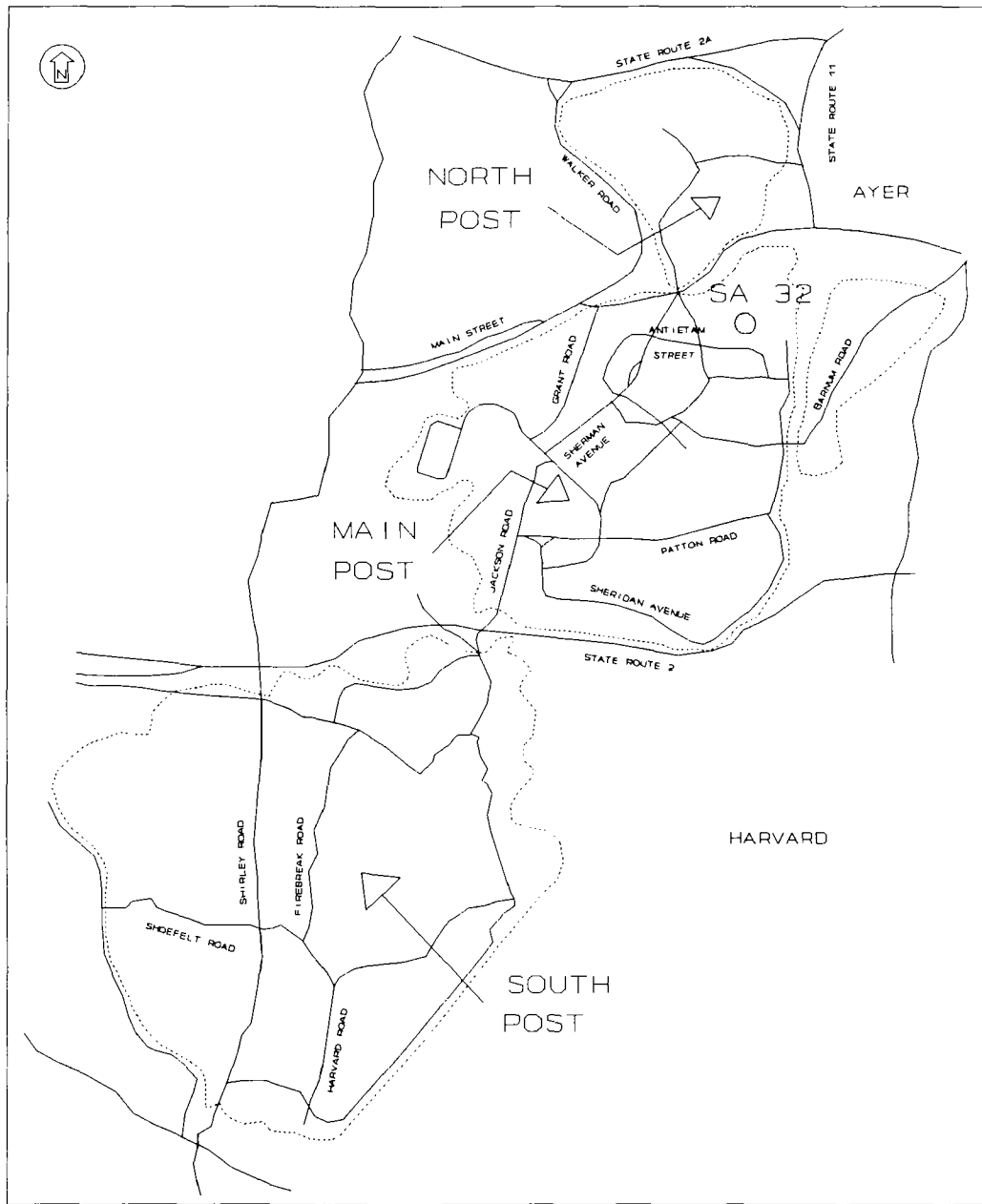
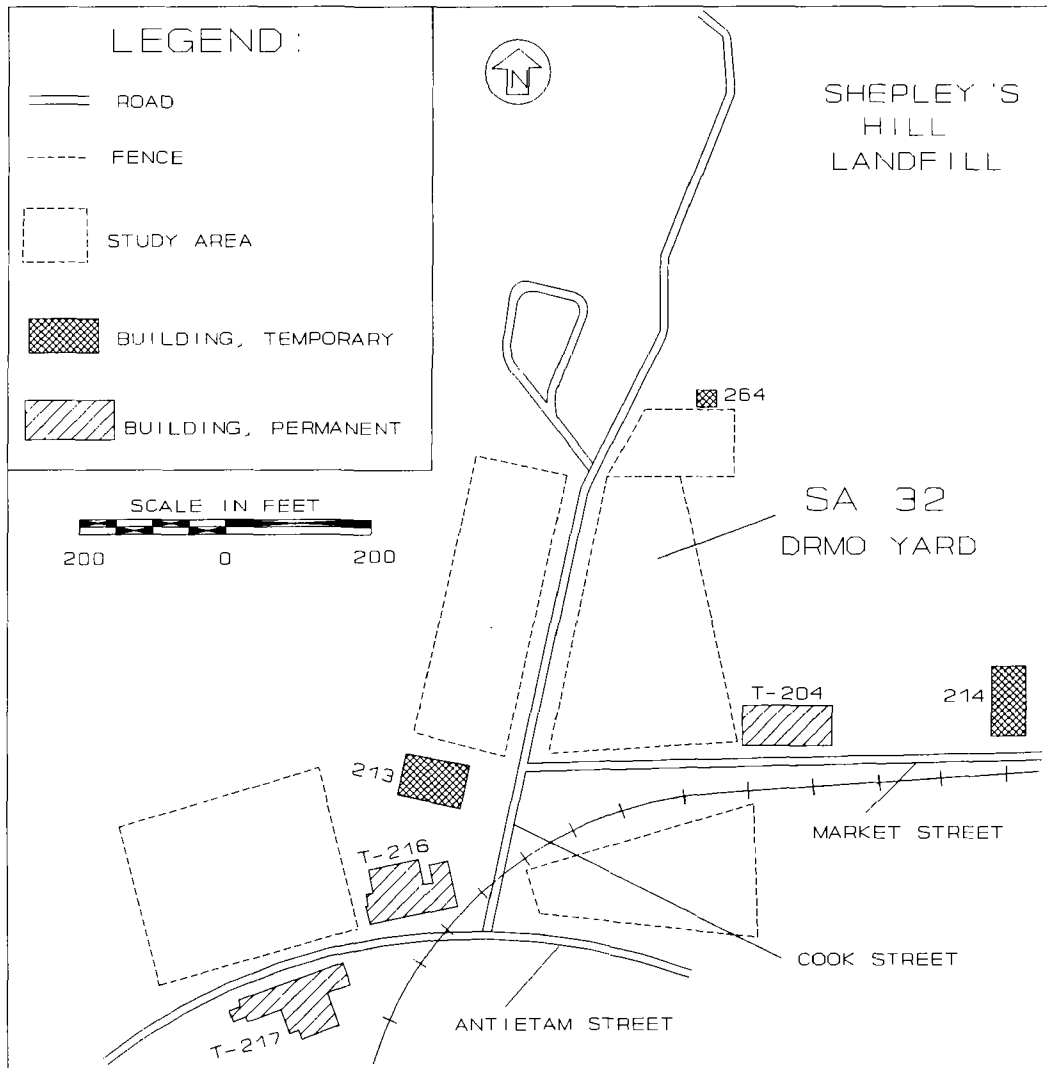


FIGURE 2, LOCATION OF SA 32

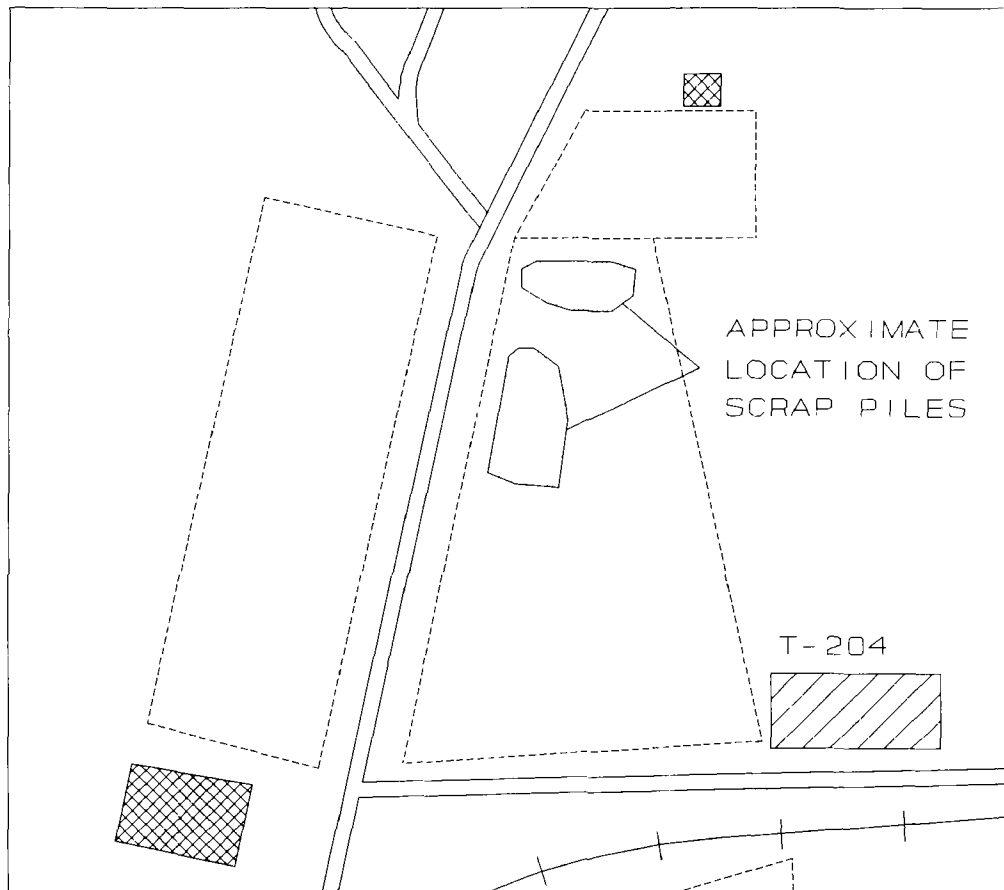


proposed to be removed under this removal action may also be contaminated and serve as a continuing source of contamination.

B. OTHER ACTIONS TO DATE

To date, no other actions to abate, stabilize, or eliminate the release of contamination from the site have occurred. The site has been recommended for conduct of a Remedial Investigation (RI), which began in September, 1992. This investigation may recommend additional interim remedial actions for SA 32. If warranted, a Feasibility Study (FS)

FIGURE 3, APPROXIMATE LOCATION OF SCRAP PILES



will also be conducted for this site, which will recommend a final remedial action for the entire site.

C. STATE AND LOCAL AUTHORITIES' ROLE

The proposed removal action and corresponding documents for SA 32 will be reviewed by the U.S. Environmental Protection Agency (USEPA) Region I and the Massachusetts Department of Environmental Protection (MDEP) prior to implementation. To date, no emergency response action or requests for USEPA assistance have been made.

III. THREATS TO HUMAN HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

Section 300.415 of the NCP outlines factors to be considered to determine the appropriateness of a removal action. This section evaluates factors for SA 32.

A. THREATS TO HUMAN HEALTH OR WELFARE

1. Actual or potential exposure to hazardous substances or pollutants or contaminants by nearby populations or the food chain

There has not been a formal risk assessment conducted for this site. A complete risk assessment will be conducted in conjunction with the RI. To date, no exposure to chemicals at this SA has been documented.

2. Actual or potential contamination of drinking water supplies

To date, no testing of the actual scrap piles or individual items has been conducted. This testing will be done as a part of the proposed removal action. If the scrap is contaminated, as suspected, the contamination could potentially infiltrate into the groundwater through precipitation washing the contaminants off of the scrap material surfaces. The closest groundwater supply well is the installation's Grove Pond well field, located approximately 3,500 feet to the east.

3. Hazardous substances, pollutants, or contaminants in drums, barrels, tanks, or other bulk storage containers that may pose a threat of release

No testing of the actual scrap piles or containers have been conducted to date. However, the potential exists for leaking containers to release PCB containing oils on to the asphalt surface. These oils may then infiltrate into the ground and migrate to the groundwater. Precipitation may also carry the oils off site and into storm water drains.

4. High levels of hazardous substances, pollutants or contaminants in soils at or near the surface that may pose a threat of release

As discussed previously, to date, no testing of the actual scrap piles or individual items has been conducted. However, if the items are contaminated, they could serve as a source of contamination of surface soil through washing of contaminants from the surface of the scrap by rain and snow melt.

5. Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released

As described previously, rainfall and snow melt onto the contaminated scrap may result in the release of contaminants.

6. Threat of fire or explosion

The DRMO yard (SA 32) is designated as a no smoking area to prevent fire hazards due to petroleum and other solvent related vapors and liquids.

B. THREATS TO THE ENVIRONMENT

1. Actual or potential exposure to hazardous substances or pollutants or contaminants by nearby populations or the food chain

Exposure to the potentially contaminated scrap piles by ecological receptors has not been documented, but is possible. The proposed removal action would mitigate risks associated with contaminated scrap items at SA 32. In this manner, exposure of contaminants to ecological receptors would be controlled.

2. Actual or potential contamination of drinking water supplies

As discussed earlier, the potentially contaminated scrap could serve as a source of contamination of groundwater underlying the site. The proposed removal action would serve to eliminate this source.

3. Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers that may pose a threat of release

No testing of the actual scrap piles or containers has been conducted to date. However, the potential exists for leaking containers to release PCB containing oils on to the asphalt surface. These oils may then infiltrate into the ground and migrate to the groundwater. Precipitation may also carry the oils off site and into storm water drains.

4. High levels of contaminants or pollutants or contaminants in soils at or largely near the surface that may migrate

As described previously, if the items are contaminated, they could serve as a source of contamination of surface soil through washing of contaminants from the surface of

the scrap by rain and snow melt.

5. Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate

As described previously, rainfall and snow melt onto the contaminated scrap may result in the release of contaminants.

6. Threat of fire or explosion

The DRMO yard (SA 32) is designated as a no smoking area to prevent fire hazards due to petroleum and other solvent related vapors and liquids.

IV. ENDANGERMENT DETERMINATION

A time critical removal action to facilitate the rapid cleanup of contaminated scrap material and asphalt on SA 32 has been identified. Actual or threatened releases of pollutants and contaminants from this site, if not addressed by implementing the response action described in this Action Memorandum, may endanger human health and welfare and/or may present a risk to the environment.

V. EXEMPTION FROM STATUTORY LIMITS

The removal action described in this Action Memorandum will meet the "consistency" criterion as defined by the USEPA's "Superfund Removal Procedures, Action Memorandum Guidance" (December 1990; USEPA 540/P-90/004) (i.e., continued response actions are otherwise appropriate and consistent with the remedial action to be taken) for several reasons. First, the removal action will support a follow on RI. Second, the removal action is necessary to prevent potential migration of potential contamination from the surface of the scrap items into the underlying soil and groundwater. Third, the removal action is appropriate because it will mitigate any threat to human health and the environment and will contribute to the overall remediation of the site.

VI. PROPOSED ACTIONS AND ESTIMATED COSTS

A. PROPOSED ACTION

1. Proposed action description

The proposed action is to remove and dispose of all of the small scrap located in the storage yard adjacent to building T-204 in accordance with 310 CMR 30.00 and 40 CFR 761. The removal action would be protective of human health and the environment and would be cost effective. Since the removal action will be completed as a time-

critical removal, an Engineering Evaluation/Cost Analysis will not be prepared. Appendix A to this Action Memorandum consists of the removal contractor's proposed Operations Plan and comments by the Fort Devens Installation Environmental Management Office on the Operations Plan. Appendix B to this Action Memorandum is a listing of specific items to be wipe sampled by the removal contractor. Specific tasks involved are described below:

- The scrap consists of various types of materials (i.e. steel, aluminum, stainless steel, plastic, seat cushions, rubber, copper wire, etc.). The larger of the scrap items are listed in Appendix B. Standard wipe sampling will be performed on all items specified by the Government. The purpose of this sampling will be to determine if the item has been contaminated with PCBs. The wipe sampling will be done in accordance with the USEPA's SW-846.
- After receiving the results of the wipe samples, a determination will be made on whether or not certain items will be decontaminated or disposed off site. If items are to be decontaminated, the decontamination procedure will be performed in accordance with 40 CFR 761.125, and analytical tests will be done to determine if the item is actually cleaned. If the wipe tests indicate that the cleanup standard of 10 $\mu\text{g}/100 \text{ cm}^2$ has not been met, the surface will be recleaned and retested. All materials used for the decontamination procedure will be labeled and disposed of in accordance with 40 CFR 761.60 (Appendix A).
- All hazardous waste will be containerized, labeled, handled, stored, transported and disposed of in accordance with State and Federal regulations, reference 310 CMR 30.00, 40 CFR 262.30, 40 CFR 268.50, 40 CFR 761, 49 CFR 171 through 177. The volume of the metal scrap will be reduced as much as possible before loading into the containers. All hazardous waste being removed from Fort Devens will be manifested using the Uniform Hazardous Waste Manifest, EPA Form No. 8700-22 (Appendix A).
- A post cleanup report will be provided to Fort Devens prepared in accordance with 40 CFR 761.125.

2. Contribution to Remedial Performance

The disposal and decontamination of the scrap material

in the DRMO yard (SA 32) would remove a potential continuing source for soil and groundwater contamination. Therefore, the removal action would be appropriate for any long term remedial action that may be required for this site, based upon the ongoing RI.

3. Description of alternative technologies

Since the removal action described in this Action memorandum will be conducted as a time-critical action, alternative technologies were not considered.

4. Applicable or Relevant and Appropriate Requirements (ARARs)

ARARs have not yet been developed for this site. The removal action will follow appropriate state and federal guidelines.

5. Project Schedule

The proposed removal action will require approximately 45 days to accomplish.

B. Estimated Cost

The removal action of the scrap material in the DRMO yard described in this Action Memorandum will cost approximately \$98,000.

VII. OUTSTANDING POLICY ISSUES

None Identified.

VIII. EXPECTED CHANGE IN THE SITUATION SHOULD NO ACTION BE TAKEN OR ACTION DELAYED

If the proposed action is delayed or not implemented, contaminants will potentially continue to infiltrate into the underlying soil and groundwater.

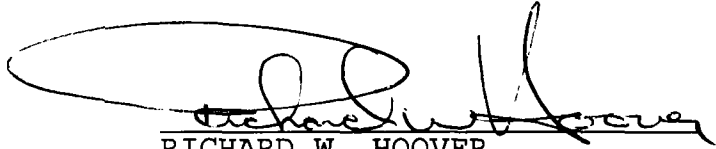
IX. ENFORCEMENT

The Department of the Army (DA) is the lead agency for Fort Devens. The removal action will not be financed through Superfund; all funding will be provided by the Department of Defense (DOD) through DA and Fort Devens. Therefore, enforcement strategies do not apply to this removal action.

X. RECOMMENDATION:

This document presents a proposed removal action for surface soils at SA 32 (DRMO yard) at Fort Devens, Massachusetts, developed in accordance with CERCLA as amended by SARA and is consistent with the NCP.

Conditions at this site meet the NCP Section 300.416(b)(2) criteria for a removal action. Therefore, the removal action is recommended for SA 32 scrap material.



RICHARD W. HOOVER
Colonel, U.S. Army
Installation Commander

26 Oct 92
Date

GLOSSARY OF ACRONYMS

BRAC	Base Realignment and Closure
BTEX	Benzene, Toluene, Ethylbenzene, and Xylene
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
DA	Department of the Army
DEH	Directorate of Engineering and Housing
DOD	Department of Defense
GC	Gas Chromatography
MDEP	Massachusetts Department of Environmental Protection
MEP	Master Environmental Plan
NCP	National Contingency Plan
NPL	National Priority List
PA	Preliminary Assessment
POL	Petroleum, Oil, and Lubricants
ppm	parts per million
RI	Remedial Investigation
SA	Study Area
SARA	Superfund Amendments and Reauthorization Act
SI	Site Investigation
TPHC	Total Petroleum Hydrocarbons
USEPA	United States Environmental Protection Agency
UST	Underground Storage Tank
VOC	Volatile Organic Compound

APPENDIX A

DENISON OIL, INC.
Environmental Services
25 Marion Drive, Kingston, MA 02364
Phone (617) 582-2223 / Fax (617) 582-2728

DRMO Scrap Yard Cleanup
Project #EQ-19110-2P
Fort Devens, MA

Site Contact: Tim Rezendes, Environmental Mgr.
508-796-2821

Fort Devens Hospital:
Fort Devens Military Police:
Dennison Oil, Inc.: 800-852-3355

I: SITE PREPARATION:

Set up clean area just inside on the right side of the double gate. A platform of 2" x 4"s and plywood will be constructed to act as a clean area platform. On the platform will be stored:

- Personnel Protective Equipment
- First Aid Kit
- Drinking Water
- Materials (Polyethylene Sheeting, etc.)
- Portable Toilet
- Wash Water and Soap

Directly next to the clean area platform will be a personnel decontamination area. This area will be constructed with a layer of polyethylene sheeting on the asphalt surface. The sheeting will be secured with wooden strapping nailed into the asphalt below. The polyethylene will be replaced as required. At the time it is replaced, it will be considered PCB contaminated. Contaminated polyethylene and personnel protective equipment will be collected in plastic trash bags. This material will be disposed of with the PCB contaminated scrap.

II: SITE WORK

Personnel Protective Equipment will consist of hard hat, safety glasses, respirator with carbon canister and dust filter, tyvek suit, rubber gloves, and rubber boots. Site work will initiate

617 293 5473

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(encl. 2)

- A. staging of the items listed by the Government to be retained for wipe sampling.
- B. consolidation of items scattered throughout the yard which are to be disposed of.

Staging and consolidation will be accomplished with a track excavator. Depending upon existing site conditions, a rubber tire backhoe may be used to consolidate the small scrap items. Staged items will be positioned in an orderly fashion to enable access for sampling and decontamination, if required. Items destined for disposal will be consolidated with the existing stockpile. Bulky items will be further compacted using the excavator bucket and/or running over the items with the excavator's tracks. If necessary, a powered rotary saw will be utilized during the consolidation. All miscellaneous items within the fenced area will either be staged for wipe sampling or consolidated for disposal. Dust suppression is not anticipated to be an issue should the natural weather pattern provide periods of precipitation. If dust suppression is required, a controlled water mist will be used. Electric power and water will be made available by the U.S. Army.

III: WIPE SAMPLING

To be conducted in accordance with 40 CFR 761. Each item will be inspected for obvious areas of staining and/or likely contaminant paths. Prior to sampling, specific approach for each item will be mutually agreed upon with the Environmental Manager.

IV: DECONTAMINATION OF GOVERNMENT ITEMS

Should decontamination be required, each item will be placed upon polyethylene. An industrial detergent solution will be applied and worked with a heavy duty scrub brush. In the event of a persistent stain, another application of detergent will be applied. Following the scrubbing, the item will be rinsed and wiped. Rinsewater will be collected with an industrial vacuum. The liquid will then be containerized in drums. Any rags and poly will be disposed of with the scrap stockpile.

V: TRANSPORT AND DISPOSAL

PCB contaminated scrap will be loaded into poly lined 30 cubic yard containers with the track excavator. The existing concrete pad inside the double gate at the site will be designated as the loading area.

The loading area will be prepared by removing with hand tools any loose concrete and small debris. Two layers of polyethylene sheeting will then be placed over the pad and secured with wooden strapping. The polyethylene covered pad will provide a clean area for vehicles to park while loading.

As each transport vehicle arrives at the site, it will weight in at the Fort Devens scale to determine net vehicle weight (empty). After loading, the transport vehicle will return to the scale to determine gross vehicle weight. This will provide an opportunity to review each loaded vehicles's weight to ensure compliance with minimum and maximum load requirements.

PCB contaminated scrap will be loaded with the track excavator. Care will be taken to avoid dropping loose material on the ground during loading. Personnel will retrieve any such material and replace polyethylene covering the loading area as needed. The bucket for the excavator will be used to secure and compact, as needed, the scrap which has been loaded into the container. Once the container has been loaded securely, the truck will exit through the double gate. The container will be covered with a tarp and secured.

The material will be transported to:

USPCI, Inc.
Grassy/Grayback Mountain Facility
8960 North Highway 40
Lakepoint, Utah, 84074

Manifests will be submitted to the Fort Devens Environmental Mgt. Office three working days prior to transport and disposal date.

VI: EQUIPMENT DECONTAMINATION

Excavator and Heavy equipment will be swept clean. Should oily residue be present, the equipment will be cleaned in the same manner as the Government Items requiring decontamination. The same procedure will apply to small power tools and hand tools.

VII: POST CLEANUP REPORT

A complete account of activities from daily worksheets, manifest copies and analysis results will be included.

1. Add to the plan the following phone numbers: Fort Devens Hospital: 796-6817; Fort Devens Military Police: 796-3334; Fort Devens Fire Department: 796-2117.

2. Provide a sketch of the site that indicates the approximate locations of clean area, staging area for wipe sampling, loading area for trucks/containers when loading scrap.

3. In section I: SITE PREPARATION,

(a) Specify which gate the clean area will be set up by. There are a couple of gates on site.

(b) Request that two layers of polyethylene being put down on the asphalt for the personnel decontamination area.

(c) Specify the thick of "plastic trash bags" that the contaminated polyethylene & PPE will be collected in. Will the plastic bags be placed in drums when moved to the disposal site?

4. In section II: SITE WORK;

(a) What type of "existing site conditions" are expected that will require the use of a rubber tire backhoe?

(b) How heavy is the track excavator? Will the track excavator damaged the existing asphalt surface? If so, it can not be used at the site.

(c) Delete the use of the powered rotary saw. No cutting is allowed.

5. In section III: WIPE SAMPLING,

(a) Add to second sentence after Each item "to be retained by the Government"...

(b) Add to the last sentence that the sampling must be done in accordance with USEPA's SW-846.

6. In section IV: DECONTAMINATION OF GOVERNMENT ITEMS,

(a) Add to paragraph, "Wipe sampling and analyses will be done in accordance with USEPA's SW-846 to determine if the item(s) is clean before removing from the fenced area.

7. In section V: TRANSPORTATION AND DISPOSAL,

(a) Be more specific on what materials or wastes are being transported to USPCI, Inc.

(b) There is confusion on what type of containers the scrap will be loaded into. Are the 30 cubic yard (cy) containers roll-off type or will there be 30 cy "dump trucks"?

(c) Add sentence indicating that all containers will be properly labelled, handled, stored and transported in accordance with the applicable State and Federal regulations.

8. In section VI: EQUIPMENT DECONTAMINATION,

(a) The excavator and heavy equipment will have to be swept clean and also washed/decontaminated with the industrial detergent solution. After cleaning the equipment, wipe sampling and analyses will have to be done to determine if the equipment is clean before the equipment is removed from the site.

9. In section VII: POST CLEANUP REPORT,

(a) Add to section "Report will be submitted within working days after the cleanup is complete.

APPENDIX B

10. POST CLEANUP REPORT

The Contractor shall submit to the Contracting Officer a post cleanup report in accordance with 40 CFR 761.125. The report shall be submitted within 10 working days after cleanup is complete.

11. The following is a list of items that the Government wishes to retain. Wipe samples shall be taken from the items and be analyzed for PCBs. After review of the analytic results, the Government will inform the Contractor on whether to decontaminate the item or dispose of the item. A sketch is attached indicating the approximate location of the item in the yard.

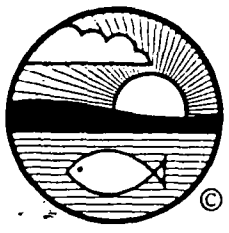
(Quantity) Description

1. (2) Green Ovens
2. (2) Commercial Dryers manufactured by General Electric and Milnor
3. (3) Rectifiers on wooden pallets (color gray)
4. (1) Volkswagon Bus (Red and White)
5. (2) Green garbage containers
6. (1) 3-1/2 CY red container with wire cable in it
7. (1) Body of Chrysler pickup (camouflage)
8. (1) 2 CY red container with empty shell casings located near the Volkswagon Bus
9. (1) Gray container in the middle of the yard near scrap pile
10. (1) Green container in the middle of the yard near scrap pile and gray container listed in 9 above
11. (1) Crushed cooling tower near scrap pile
12. (3) Refrigerators on wooden pallets
13. (3) Stainless steel hospital carts
14. (1) Stainless steel sink and table
15. (30) Wooden pallets of batteries approximately 3 feet high
16. (20) Wooden pallets of canvas approximately 3 feet high
17. (1) Yellow container near green ovens listed in 1 above

APPENDIX B (continued)

18. (1) Camouflage container near green ovens listed in 1 above
19. (1) Gray oven near yellow container listed in 17 above
20. (1) Gray mechanical equipment near green ovens listed in 1 above
21. (12) Wooden pallets of electronic equipment

***** END OF SECTION *****



**Franklin
Environmental
Services, Inc.**

185 Industrial Road
P.O. Box 617
Wrentham, MA 02093
TEL. 508-384-6151

Licensed and Permitted in the
United States and Canada
FED EPA ID #MAD084814136

ENVIRONMENTAL SERVICE PROFESSIONALS

February 4, 1993

Department of the Army
Directorate of Contracting
Ft. Devens, MA 01433

Contract No: Cleanup of DRMO Scrap Yard
PCB Contaminated Debris

Site Work Plan

I General

The following work plan shall cover items associated with the above referenced product. Attached to this plan shall be the following items:

- | | |
|-------------|--------------------------------------|
| Exhibit I | Site Plan |
| Exhibit II | Site Plan w/ Staging areas |
| Exhibit III | Progress Schedule |
| Exhibit IV | General Contract Specifications |
| Exhibit V | Site specific Health and Safety Plan |

All work shall be in strict accordance with all local, state and federal regulations as well as corresponding contract documents and specifications.

II Safety

All work shall be so accomplished as to allow maximum protection to all employees and personnel in surrounding occupied areas. Incorporated by reference shall be U.S. Army Corps of Engineers' Safety and Health Requirements manual (EM-385-1-1) for use as a guideline for performance of all associated work. As well, the contractor shall develop and issue for use a site specific Health and Safety Plan for this project. A copy of which shall be furnished to the contracting officer prior to work on site.

All personnel on site, whether contractor employees, or government personnel will be required to conform to all applicable safety requirements, health and safety training, and site specific requirements. Generally, all such requirements will be as outlined in 49 CFR 1910.120.

The contractor's site supervisor will be responsible for holding daily safety meetings. All applicable work and safety issues for that work period shall be discussed. The contracting officer's representative shall be invited and encouraged to attend these meetings.

III Work Plan

The first item of work on site shall include the setup of site work zones and clean areas. These areas shall be laid out according to the attached site plan (Exhibit II). Strict regards to pedestrian and vehicular traffic control shall be maintained to eliminate the spread of contamination beyond established lines. Traffic control shall be maintained by the use of arrange safety fencing, posted signs and marking tape.

Vehicle decontamination will take place on an area designated and marked for such use. It shall be constructed with 60 mil EPDM liner over existing bituminous pavement. It shall be bermed on four sides using wood timbers and planking beneath liner. It shall be so laid out that it is pitch to one corner. Here the decon work shall be gathered and pumped to D.O.T. approved drums for storage, testing and disposal.

Prior to disposal, all materials designated to be sampled shall be wipe~~x~~ tested in accordance with EPA's method SW-846. Upon review of results, the owner will decide what materials shall be decontaminated for salvage or will be disposed.

Items designated for salvage shall be transported to the equipment decon pad, cleaned, wipe tested again and placed in a "clean" storage area pending results of wipe tests.

Scrap slated for disposal shall be loaded onto 30 cy dump trailers. Trailers shall enter the site through the Cook Street Gate. They shall remain in the loading area until loaded utilizing tire loader and lift equipment operating in the work zones. Once loaded, the trucks shall proceed to the decon pad for cleaning, and exit through the Market Street Gate.

Most of the scrap debris will be loaded as is, into trailer dumps for delivery to Chem Waste's Facility in Model City, NY. Some larger pieces will need to be cut to facilitate transportation. Cutting will be kept to a minimum.

If cutting is necessary, it will be accomplished using acetylene torches, electric reciprocating saws, abrasive demolition saws and hand tools. If required, poly containments shall be constructed to minimize nuisance contamination of surrounding areas. Particular restrictions shall be placed on two items designated as "green ovens". It is understood these items may contain asbestos insulation. Should they require cutting, full containment will be required. All torch cutting will require prior notification of base personnel, and strict conformance with safety policies. Fire extinguishers and water hoses shall be maintained during all cutting operations.

Dust control shall be accomplished utilizing a light spray of water in the work zones. Care shall be taken to avoid puddling. Given the time of year under which the work is to take place.(January-February) Dust problems are not anticipated but shall be addressed.

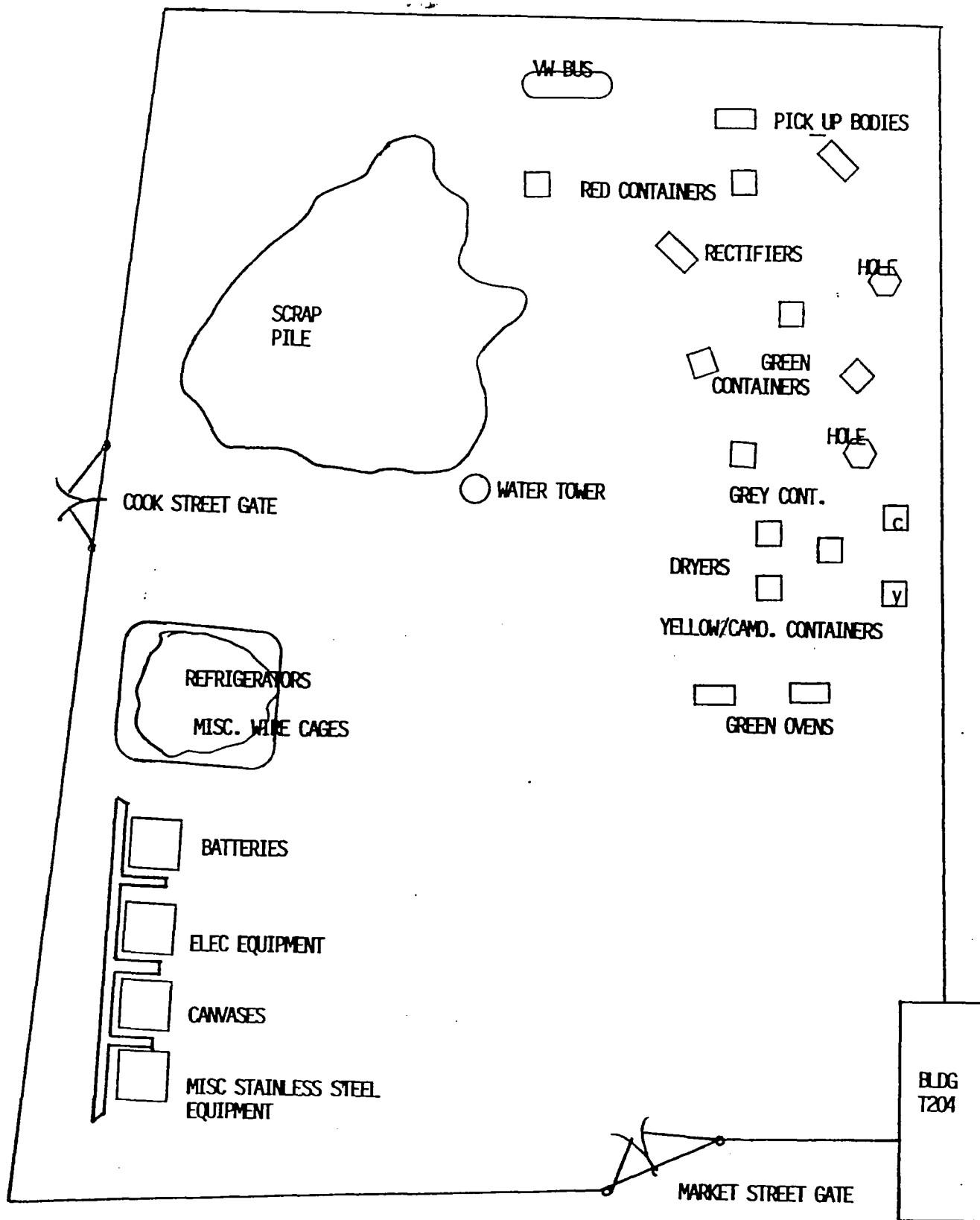
All personnel will be required to enter and exit the site through appropriated points. Donning of safety equipment and decontamination will be required and be in accordance with corresponding site specific health and safety plan for this project.(Exhibit V)

End of Plan

DRMO SCRAP YARD
PCB DEBRIS REMOVAL

SITE PLAN

EXHIBIT I
FORT DEVINS, MA



DRMO SCRAP YARD
PCB DEBRIS REMOVAL

WORK ZONE/ DECON PLAN

EXHIBIT II
FORT DEVINS, MA

