PRIVET ROAD PCB SOIL REMOVAL
WORK PLAN
REVIEW COMMENTS

1. **Comment:** Attached tag maps and tables proved the easting and northing coordinates and PCB concentration of all soil samples at Site 1. This information should be helpful in locating the areas to be removed. Please note that the Bowling Alley building location is not shown accurately on the maps. This is obvious because some of the samples appear to be within the footprint of the building. Use the building for general orientation. The sample coordinates are accurate.

**Response:** FWENC obtained coordinates and maps from the Clean Contractor.

2. **Comment:** The work plan states that 2 honey locust trees will be removed during the excavation effort. It would be preferable not to remove the trees if possible.

**Response:** FWENC was informed by the activity that the activity would be responsible for the replacement of the trees.

3. **Comment:** Due to the shallow excavation depths, it is very unlikely that dewatering will be necessary.

**Response:** Comment noted.

4. **Comment:** What is involved in “dry decontamination”?

**Response:** Dry decontamination involves using brooms, brushes, shovels, etc. to remove soil and any other material adhering to the bucket of the hydraulic excavator. Dry decontamination does not involve the use of water as a means of decontamination.

5. **Comment:** The work plan does not state the approximate depth of the excavation prior to doing confirmatory sampling. The existing data indicates that the PCB problem is shallow. Recommend using some quick field screening technology such as immunoassay test kits. This will provide rapid results and minimize the amount of clean soil we will be excavating. The 16 lab confirmatory samples proposed can supplement and verify the field results.

**Response:** Based upon information provided to FWENC by the Department of the Navy, the depth of the initial excavation shall be approximately 2-feet or less. Waste characterization sampling has indicated that the level of PCBs contained in the area are less than 35 ppm and can be managed as PA Residual waste and not a hazardous waste thus reducing the overall cost of transportation and disposal. Additionally, shipping the soil as PA Residual Waste will not require the use of the immunoassay testing since the cost of the T & D will be off-set by the use of the kit.
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2. Page 1 - The work plan states that 2 honey locust trees will be removed during the excavation effort. It would be preferable not to remove the trees if possible.

3. Page 2 - Due to the shallow excavation depths, it is very unlikely that dewatering will be necessary.

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Copy: J. Colter (w/o enclosure)