

# EBASCO

Pinette  
Breach: 7-117  
Chart:

January 8, 1992  
ARCS I 92-006  
No Response Requested

Mr. John C. Robbins, Jr.  
Sevenson Environmental Services, Inc.  
4 Ponds Edge Drive  
P.O. Box 1308  
Chadds Ford, PA 19317

Subject: ARCS I - EPA CONTRACT NO. 68-W9-0034  
WORK ASSIGNMENT NO. 011-1R34  
PINETTE'S SALVAGE YARD - RA  
REVIEW OF REVISED CORRECTIVE ACTION PLAN

Dear Mr. Robbins:

Ebasco has received Sevenson's Revised Corrective Action Plan (CAP) of December 19, 1991 and we appreciate your timely response to our request. This letter conveys our comments regarding the CAP. Comments are organized into the following categories:

- Acceptability of Terra Kleen process
- Submittal modification requirements
- Subcontract controls.

#### ACCEPTABILITY OF TERRA KLEEN PROCESS

We are encouraged by the proposed replacement of the current solvent extraction vendor and believe the CAP points the Pinette's Salvage RA toward recovery from the treatment system delays of the past year. However, the CAP, while providing general, qualitative evidence of prior system performance, does not contain sufficient details on the Terra Kleen process nor site-specific applicability for us to evaluate its acceptability at the Pinette's site. In particular, details on process logic, solvents anticipated to be utilized, and results of a bench scale test must be provided to Ebasco as soon as possible in accordance with process verification and submittal requirements of paragraphs 1.3 and 4.1 of the Specification Section 13260. Information on mass balance from prior applications of the TKC process would also be particularly useful.

Ebasco, like Sevenson, wishes to avoid a repeat of the delays, uncertainties, and ultimate STS failure which bogged down the project in 1991. While we are pleased to learn that the TKC unit

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is to be completed on January 31, 1992, we request that Sevenson report regularly to us on several critical issues:

- Status of completion of the unit.
- Will TKC receive an independent safety or QA/QC check on the unit similar to that which picked up critical flaws in the Extraksol unit? If so, Ebasco requests that results of such a check be reported to us.
- How will the new, third (?) -generation unit differ from prior TKC units?
- Will the TKC unit be fully field-tested with soil and solvent prior to shipment to the Pinette's site? If so, Ebasco requests such activities be incorporated into the project schedule and progress reported to us. We have serious concerns about the validity of the four-day delivery/set-up activity included in the CAP schedule.

Ebasco is prepared to assist Sevenson in arranging for shipment of an appropriate amount of sample for the bench scale test. Additionally, if functionally achievable, we would be interested in sending a representative to view the bench-scale test and the new unit.

Please contact me as soon as possible to set up an aggressive schedule for your submittal of all required process verification and bench-scale pre-submittals.

#### SUBMITTAL MODIFICATION REQUIREMENTS

In order to maximize the efficiency of the modification process to Sevenson's Submittals, we have reviewed your proposed changes against the current versions and present the following comprehensive list of revisions. We request that the Submittals revisions be proposed to Ebasco in the format of one ECR per Submittal section with affected pages attached showing highlighted changes and a Revision/Date footer at the base of each page.

#### Submittal A - Work Plan

- Changes as noted in Sevenson December 19, 1991 CAP
- Update Appendix A for current Curriculum Vitae.

In regard to Section 3.3.6, Ebasco requires more detail on the method of soil weighing to be utilized. Furthermore, the proposed approach should allow for weighing as soon as possible prior to the actual loading into the treatment unit.

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Submittal B - Schedule of Values

The Schedule of Values will require revision to reflect appropriate payment distribution for all lump sum items in accordance with the proposed revised schedule.

Submittal D - Health and Safety Plan

The Severson HSO must evaluate the impacts of the changed soil treatment system on this Submittal due to the new process configuration, chemicals to be utilized, and associated hazards. For example: Table 2, Item 9; and Appendix C, Section 9.

Submittal E - Construction Schedule

We are concerned that a four-day duration for delivery set-up and shakedown of a new unit at the Pinette's site is unrealistic. Please review this projected duration and advise Ebasco of the basis for this assumption. Also (see G.1 comments) please advise us how/when on-site testing and development of optimum operational settings will be determined.

Other schedule issues which should be addressed are as follows:

- The schedule appears to include no contingency for more than one pass through the unit. Please verify the validity of this assumption.
- Please advise of your planned excavation sequencing. The schedule shows overlap of > 50 ppm and 5-50 ppm excavation. How will this be accomplished within the time, space, and logistical constraints of the Pinette's RA?
- The schedule should tie 5-50 ppm excavation into STS full-scale operation.
- The schedule does not include confirmational analyses of AWTs or STS effluent.

Submittal G.1 - Construction QC Plan

- Section 2.0 should be modified to address how on-site operational testing will be accomplished with the new unit.
- Section 3.0 Quality Management Organization text and Figure 3-1.
- Section 5.5, as noted in December 19, 1991 CAP.
- Appendix A Curriculum Vitae.

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Submittal G.2 - Chemical Quality Management Plan

- Section 1.6.5 should be modified to reflect testing of residuals based on the Terra Kleen solvents to be utilized.
- A section should be added to address testing of treated soils for RCRA characteristics for solvents to be used prior to replacement in the ground.
- Table 1.0 should be modified to reflect the change in solvent and resulting analytical tests for treated soil and treatment residuals.

Submittal H - Layout of Site Facilities

- Revision for new system as per December 19, 1991 CAP.

Submittal J - Temporary Controls/Environmental Protection Plan

- Sections 6.2 and 6.3 should be verified and updated as required.
- Appendix B emissions inventory and controls as noted in December 19, 1991 CAP.

Submittal K - Dust and Vapor Control Plans

- Appendix A emissions inventory revision as required by change in soil treatment system.

Submittal L - Material Handling Plan

- Section 1.0 p 4/5A should be modified to reflect new STS facilities.
- Section 2.4 - Please note the listed transporters are inconsistent with Submittal F and the actual subcontractors utilized (Wills, Goodelle).
- Section 3.2.4 should be modified if necessary for aqueous waste generated by the new STS facilities.
- Section 5.0 should be modified to reflect revised soil weighing procedure (see Submittal A comment above) and analytical testing requirements for treated soil prior to backfill (see Submittal G.2 comments above).

Submittal O - O&M Manual

- Revision of Submittal as noted in Severson's December 19, 1991 CAP.

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Submittal P - Dewatering Plan

- Appendix A water balance should be modified to reflect requirements of new soil treatment facility (see Submittal T comments below).

Submittal Q.3 - Geomembrane

- Modify as appropriate for changes in site layout. Note prior SES FCR 16 conditionally accepted by Ebasco FCR 19.

Submittal T - AWTs Drawing/Documentation

This submittal should be modified through FCR to reflect water utilization and effluent changes caused by the new soil treatment unit. In particular, water balance should be revised. We are also concerned that the AWTs adequately handles influent and effluent parameters related to the actual solvents to be used in the new soil treatment unit.

Submittal U - STS Documentation

This submittal needs complete revision to reflect the new soil treatment unit.

Submittal W - Electrical and Instrument Drawings

- Submittal revised as noted in Sevenson December 19, 1991 CAP.

Submittal X - Subcontracting Plan

- Submittal revised as noted in Sevenson December 19, 1991 CAP.

Submittal Y - Emergency Response and Contingency Plan

- Modify Section 2.0 for personnel changes.
- Section 3.0 should be modified for a revised site layout.
- Section 4.0 should be revisited for any changes in solvents to be used in the new soil treatment system.
- Figure 1 is now obsolete.

SUBCONTRACT CONTROLS

Due to Sevenson's inability to deliver a soil treatment component for the project in 1991, Ebasco requests Sevenson inform us as to how it intends to control the proposed replacement subcontractor,

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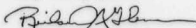
including such factors as purchase/buyout of TKC, unilateral suspension of work or other failure to perform.

Upon our receipt and review of the initial process verification and bench scale results required by Specification Section 13260, it is recommended that Ebasco and Severson meet to discuss technical status and forecast of activities to allow most efficient, expedient progress from that point forward.

Nothing in this letter is to be considered as a waiver to the subcontract terms and conditions, including price and schedule.

Please call me at (617) 451-1201 or Ms. Cathy Arnold at (703) 358-8932 if you have any technical or contractual issues, respectively.

Very truly yours,



Richard J. Gleason  
Project Manager

RJG/mec

cc: L. Seijido  
P. Gaffney  
C. Arnold  
J. Lowrey  
S. Graham

FILE: ARCS 1.1  
PRA 8.2

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bcc: R. Gilleland  
N. Barmakian  
H. Kelley

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