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NAB LITTLE CREEK
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LETTER TRANSMITTING REGULATORY COMMITTEE'S RESPONSE TO VIRGINIA
DEPARTMENT OF ENVIRONMENTAL QUALITY'S COMMENTS ON DRAFT SAMPLING AND
ANALYSIS PLAN FOR REMOVAL ACTION AT SOLID WASTE MANAGEMENT UNIT 8 DATED
SEPTEMBER 2000 NAB LITTLE CREEK VA
10/12/2000
CH2MHILL



CH2MHILL

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October 12, 2000

Mr. Robert J. Weld
Department of Environmental Quality
629 Main Street, 4th Floor
Richmond, VA 23219

Subject: Naval Amphibious Base Little Creek (NABLC), Virginia Beach, Virginia
Response to comments for the *Draft Sampling and Analysis Plan for Removal Action SWMU 8/144*

Dear Mr. Weld:

On behalf of the Navy, CH2M HILL has prepared the following responses as a result of your comments regarding the *Draft Sampling and Analysis Plan for Removal Action SWMU 8/144* dated September 2000:

Comment No. 1

Section 1.0, Introduction, Last Paragraph: This paragraph indicates that approximately 2200 cubic yards of ABM/soil will be removed. Section 2.1 (Page 2-5) indicates that approximately 1800 cubic yards of ABM/soil will be removed. Please explain or correct this discrepancy.

Response to Comment No. 1

The volume of soil containing blast grit is estimated to be 1,800 cubic yards based upon field measurements made during the January 2000 field investigation. This represents the estimated volume of visible ABM. This volume should be considered a minimum requirement to remove the visible blast grit from SWMU 8. The volume estimated for removal in the *Final Engineering Evaluation/Cost Analysis (EE/CA) for SWMU 8, West Annex Sandblast Area, Naval Amphibious Base Little Creek, Virginia Beach, Virginia* (CH2M HILL, September 2000) for the preferred alternative (Alternative 2 – Excavation to Residential Screening Standard and Offsite Disposal) was 2,200 cubic yards. This estimate was based upon the estimated volume plus 20% over excavation to achieve the residential screening standard. Please consider the 1,800 cubic yards to be the anticipated minimum amount of excavation required if residential clean-up criteria can be met through removal of visible blast material. The 2,200 is estimated to be the maximum amount of excavation required should 20% over excavation be required. Section 2.1 Page 2-5 will be revised to indicate 2,200 cubic yards of material is estimated for removal.

Mr. Robert J. Weld
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Comment No. 2

Section 2.1, Page 2-5, Last Paragraph: This paragraph indicates that the Site Investigation Report is due to be completed in September 2000. Since this document has not yet been submitted, this date should be revised.

Response to Comment No. 2

At the time the *Draft Sampling and Analysis Plan for Removal Action SWMU 8/144* was completed, it was *anticipated* the Site Investigation Report would also be submitted at the end of September 2000. The report was not submitted in September but will be submitted in October of 2000.

Comment No. 3

Appendices: Site Specific Checklists (e.g. – FSP, IDW, QAPP, etc.) should be included as appendices in this document.

Response to Comment No. 3

Site Specific Checklists (e.g. – FSP, IDW, QAPP, etc.) were prepared for this document, but were not submitted with the draft document. We will provide you with a copy of the checklists for your review, and the checklists will be included in the final version

Please feel free to contact me at (757) 460-3734, ext. 17 if you have any further questions.

Sincerely,

CH2M HILL



Matt Louth
Project Manager

Cc: Mr. Schirmer, LANTDIV
Mr. Beach, USEPA
Mr. Sawyer, IR Coordinator
Mr. MacEwen, CH2M HILL
Ms. Caldwell, CH2M HILL

SWMU 8 Removal Action Confirmation Sampling - Derived Waste Plan Checklist

This checklist supplements the Master IDW Plan with site-specific information. Once completed for a specific project, it provides necessary IDW information for each investigation. It is to be taken into the field with the Master IDW Plan.

Site: SWMU 8 (West Annex Sandblasting Area)

1. IDW Media: Soil cuttings
 Well development or purge water
 Decontamination residual soil and wastewater
 PPE or disposable equipment
 Other Excavated Materials (responsibility of contractor)

2. Expected Regulatory Status: Hazardous
 Solid Waste
 Unknown
 Other Waste management activities regulated by OSHA
Hazardous waste standard (1910.120)

3. Site Location: Excavation limited to area shown in Sampling and Analysis Plan. (See Figure 2-1 in SWMU 8 Sampling and Analysis Plan)

4. Nature of Contaminants Expected:
 Petroleum contamination
 Polycyclic aromatic hydrocarbon
 Pesticides
 Herbicides
 PCBs
 Metals
 Other -

5. Volume of IDW Expected: Drums
 2,400 Cubic Yards
 Tons
 Gallons

6. Compositing Strategy for Sample Collection: No IDW sampling is planned. IDW disposal will be the responsibility of the removal action contractor.

7. IDW Storage

X As per Master IDW Plan Other _____

8. Waste Disposal

X As per Master IDW Plan Other _____

Quality Assurance Project Plan Checklist

This checklist supplements the Master QAPP with site-specific information. Once completed for a specific project, it provides necessary quality assurance information for each investigation. It is to be taken into the field with the Master QAPP.

Site: SWMU 8 (West Annex Sandblast Yard)

1. List sampling tasks: Confirmation sampling of field screening for lead by removal action contractor (with Niton Model 700 XRF) including lead (48-hr turnaround), TAL metals and PAHs (19 sample locations) and four samples for TAL metals and TCL organics.
2. List data quality objectives: The objectives of the SWMU 8 removal action confirmation sampling include:
 - a. Provide confirmation analytical data to evaluate effectiveness of removal action as compared to EPA Region III residential screening criteria for lead.
 - b. Completion of a qualitative risk screening assessment from data collected during the investigations
3. Organization:

LANTDIV Navy Technical Representative	Bob Schirmer / LANTDIV
USEPA Remedial Project Manager	Bruce Beach / USEPA
VDEQ Federal Facilities Project Manager	Robert Weld / VDEQ
CH2M HILL Activity Manager	Scott MacEwen / CH2M HILL WDC
Quality Control Senior Review	Ann West / CH2M HILL WDC
Technical Project Manager	Donna Caldwell / CH2M HILL HRO
Field Team Leader	Paul Landin / CH2M HILL HRO
4. Table of samples with analyses to be performed and associated QC samples (attached):

See SWMU 8 Sampling and Analysis Plan
5. Analytical Quantitation Limits:

X <input type="checkbox"/>	As per Table 8-2 of Master QAPP	<input type="checkbox"/>	Other (attached)
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6. QA/QC Acceptance Criteria (e.g., precision, accuracy)

X <input type="checkbox"/>	As per Table 4-1 of Master QAPP	<input type="checkbox"/>	Other (attached)
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7. Data reduction, validation, and reporting:

X <input type="checkbox"/>	As per Section 9 of Master QAPP	<input type="checkbox"/>	Other (attached)
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8. Internal QC Procedures (field and laboratory):
X_____As per Section 10 of Master QAPP _____Other (attached)
9. Corrective Action:
X_____As per Section 14 of Master QAPP _____Other (attached)
10. Other deviations from Master QAPP - None

Site-Specific Field Sampling Plan Checklist

This checklist supplements the Master Field Sampling Plan with site-specific information. Once completed for a specific project, it provides necessary field sampling information for each investigation. It is to be taken into the field with the Master FSP.

Site: SWMU 7 (Small Boats Sandblast Yard) and SWMU 8 (West Annex Sandblasting Area)

1. Tasks to be performed:

- | | |
|--|--|
| <input type="checkbox"/> Geophysical surveys
<input type="checkbox"/> Soil gas surveys
<input type="checkbox"/> Sediment Sampling
<input checked="" type="checkbox"/> Surface soil sampling
<input type="checkbox"/> Soil boring installation
<input type="checkbox"/> Subsurface soil sampling
<input type="checkbox"/> Monitoring well installation and development
<input type="checkbox"/> Monitoring well abandonment
<input type="checkbox"/> Groundwater sampling | <input type="checkbox"/> In-situ groundwater sampling
<input type="checkbox"/> Aquifer testing
<input type="checkbox"/> Hydrogeologic measurements
<input type="checkbox"/> Biota sampling
<input type="checkbox"/> Trenching
<input checked="" type="checkbox"/> Land surveying
<input type="checkbox"/> Investigation derived waste sampling
<input type="checkbox"/> Decontamination
<input type="checkbox"/> Other _____ |
|--|--|

2. Field measurements to be taken:

- | | |
|--|---|
| <input type="checkbox"/> temperature
<input type="checkbox"/> pH
<input type="checkbox"/> dissolved oxygen
<input type="checkbox"/> turbidity
<input type="checkbox"/> specific conductance
<input type="checkbox"/> organic vapor monitoring
<input type="checkbox"/> geophysical parameters (list):
<input type="checkbox"/> electromagnetic induction
<input type="checkbox"/> ground-penetrating radar | <input checked="" type="checkbox"/> surveying
<input type="checkbox"/> magnetometry
<input checked="" type="checkbox"/> global positioning system
<input type="checkbox"/> soil gas parameters (list):
<input type="checkbox"/> combustible gases
<input type="checkbox"/> water-level measurements
<input type="checkbox"/> pumping rate
<input checked="" type="checkbox"/> other: dust monitoring |
|--|---|

3. Sampling program (nomenclature, etc.):

- As per Section 3.1 of Master FSP Other

4. Map of boring, sampling locations with proposed excavation area (attach to checklist):
See SWMU 8 Sampling and Analysis Work Plan.

5. Table of field samples to be collected: See SWMU 8 Sampling and Analysis Plan.

6. Applicable SOPs (Volume 2 of Master Project Plans) or references to specific pages in Master FSP:

- Shallow Soil Sampling
- Homogenization of Soil and Sediment Samples

- Chain-of-Custody
- Packaging and Shipping Procedures
- Equipment & Field Rinse Blank Preparation
- Decontamination of Personnel and Equipment
- Decontamination of Drilling Rigs and Equipment
- Disposal of Fluids and Solids

6. Site-specific procedures or updates to protocols established in the Master FSP:
Described in the Site Investigation Work Plan.

Site-Specific Health and Safety Plan

This checklist must be used in conjunction with the Master HASP. This checklist is intended for use by CH2M HILL employees only. All CH2M HILL employees performing tasks under this checklist must read and sign both this checklist and the Master HASP and agree to abide by their provisions (see EMPLOYEE SIGNOFF attached to the checklist).

Site: SWMU 8 (West Annex Sandblasting Yard)

Location(s): Sampling Location Maps attached (SWMU 8 Sampling and Analysis Plan)

This document shall be maintained on site with the Master Health and Safety Plan. It will include as attachments from the Work Plan a site map and the site characterization and objectives for this site.

The procedures described in the Master Health and Safety Plan will be followed unless otherwise specified in this Site-Specific Health and Safety Plan.

1. HAZWOPER-Regulated Tasks

- | | |
|---|---|
| <input type="checkbox"/> Test pit and excavation | <input type="checkbox"/> Groundwater sampling |
| <input type="checkbox"/> Soil boring installation | <input type="checkbox"/> Aquifer testing |
| <input type="checkbox"/> Geoprobe boring | <input type="checkbox"/> Hydrologic measurements |
| <input type="checkbox"/> Geophysical surveys | <input type="checkbox"/> Surface water sampling |
| <input type="checkbox"/> Hand augering | <input type="checkbox"/> Biota sampling |
| <input type="checkbox"/> Subsurface soil sampling | <input type="checkbox"/> Investigation-derived waste (drum) sampling and disposal |
| X <input checked="" type="checkbox"/> Surface soil sampling | X <input checked="" type="checkbox"/> Observation of loading of material for offsite disposal |
| <input type="checkbox"/> Soil gas surveys | X <input checked="" type="checkbox"/> Oversight of remediation and construction |
| <input type="checkbox"/> Sediment sampling | <input type="checkbox"/> Other _____ |
| <input type="checkbox"/> Monitoring well/drive point installation | |
| <input type="checkbox"/> Monitoring well abandonment | |

2. Hazards of Concern: (Check as many as are applicable. Refer to Section 3 of Master H&S Plan for control measures):

- | | |
|--|---|
| X <input checked="" type="checkbox"/> Heat stress | X <input checked="" type="checkbox"/> Back injury |
| <input type="checkbox"/> Cold stress | <input type="checkbox"/> Confined space entry |
| X <input checked="" type="checkbox"/> Buried utilities, drums, tanks | X <input checked="" type="checkbox"/> Trenches, excavations |
| <input type="checkbox"/> Inadequate illumination | <input type="checkbox"/> Protruding objects |
| X <input checked="" type="checkbox"/> Drilling | X <input checked="" type="checkbox"/> Vehicle traffic |
| X <input checked="" type="checkbox"/> Heavy equipment | <input type="checkbox"/> Ladders, scaffolds |
| <input type="checkbox"/> Working near water | <input type="checkbox"/> Fire |
| <input type="checkbox"/> Flying debris | <input type="checkbox"/> Working on water |
| <input type="checkbox"/> Gas cylinders | X <input checked="" type="checkbox"/> Snakes or insects |
| X <input checked="" type="checkbox"/> Noise | <input type="checkbox"/> Poison ivy, oak, sumac |
| X <input checked="" type="checkbox"/> Slip, trip, or fall hazards | X <input checked="" type="checkbox"/> Ticks |

_____ Radiological

X_____ Other airborne particulates

3. Contaminants of Concern (List if known. Refer to Table 3.8 of the Master HASP)

PAHs	Metals	Pesticides

4. Personnel (List CH2M HILL field team members and telephone numbers):

Field team leader(s)	Donna Caldwell	757-873-1442
Site safety coordinator(s)	Donna Caldwell	757-873-1442
Field team members	Paul Landin	757-460-3734

5. Contractors/Subcontractors

X_____ Procedures as per Master HASP

X_____ Other Removal action contractor and subcontractor have not been identified at the writing of this HASP checklist.

Name: To be added _____

Contact: To be added _____

Telephone: To be added _____

6. Level of personal protective equipment (PPE) required: D
Refer to Table 5.1 of Master HASP, CH2M HILL SOPs HS-07 and HS-08, and Respiratory Protection, Section 2 of the Site Safety Notebook.

7. Air monitoring instruments to be used (refer to Master HSP for action levels):

_____ OVM 10.6	_____ FID
_____ CGI	X_____ Dust monitor
_____ O ₂	_____ PID

8. Decontamination procedures:

_____ As per Section 7 of Master HASP

X_____ Other As described in the SWMU 8 Work Plan.

9. List any other deviations or variations from the Master HASP: None
10. Emergency Response (Check that all names and numbers are correct on page 37 of Master HASP and attach corrected page to this checklist)
11. Map to hospital (Highlight route to hospital from site and attach to this checklist)
12. Emergency Contacts (Check that all names and numbers are correct on page 37 of Master HASP and attach corrected page to this checklist)
13. Approval. This prepared site-specific checklist must be approved by John Longo/NJO or authorized representative

Name John Longo/NJO

Title: Health and Safety Manager Date:



14. Employee Signoff. All CH2M HILL employees working at the site must sign the attached Employee Signoff for the checklist as well as for the Master HASP.

