



**CH2MHILL**

Scott MacEwen  
8/6/97-01421

CH2M HILL  
625 Herndon Parkway  
Herndon, VA  
20170-5416  
P.O. Box 4400  
Reston, VA  
20195-1483  
Tel 703.471.1441  
Fax 703.481.0980

August 6, 1997

138769.DS.SR

Commander  
LANTNAVFACENCOM  
Attention: Code 18223, Mr. Scott Park  
1510 Gilbert Street  
Norfolk, VA 23511-2699

Dear Mr. Park:

Subject: Contract N62470-95-D-6007  
Navy Clean II Program  
Contract Task Order 0025  
Site 7 Debris Removal, NAB Little Creek  
Comments on Draft Work Plan

CH2M HILL has completed review of the *Draft Work Plan for Debris Removal Activities at Site Number 7, Naval Amphibious Base Little Creek, Virginia Beach, Virginia* prepared by OHM Remediation Services Corporation, and dated July 10, 1997. In general, the work plan demonstrates a good understanding of the design documents and the goals of debris removal activities, however, the specific comments listed below should be addressed before the work plan is approved.

Comment Number <i>Work Plan</i>	Page	Section or Paragraph	Comment
1		General	Provide a Field Sampling Plan and Quality Assurance Plan for sampling as required by Specifications Section 01115, Paragraph 1.2.1.1.g or provide additional detail regarding the sampling and analysis required for this project (See Comments 6 and 11 below)
2	2-2	2.4.2	Is leaving cleared vegetation in place acceptable to the Navy? In particular, the activity has expressed concern with appearances along Helicopter Road

Comment Number	Page	Section or Paragraph	Comment
3	2-3	2.6	<p>and Amphibious Drive. Leaving cleared vegetation in place may create an unacceptable eyesore. Leaving vegetation in place near the access roads through wooded areas is probably permissible.</p> <p>In addition to the E&amp;S measures mentioned here, silt fence or other protective measures may be necessary around areas cleared along Amphibious Drive or Helicopter Road for installation of the perimeter fence.</p>
4	2-3	2.7	<p>OHM states that they will utilize an existing gravel road connecting the two access gates. My recollection is that the gravel road only extends a short distance into the open area on top of the landfill at each end, and that there is no road in the central area of the site. Please verify.</p>
5	2-3	2.7.1	<p>The debris transfer area shown on Figure 2 and discussed in this section appears somewhat small to accommodate an excavator and provide turnaround space for a front-end loader. Also, the area is adjacent to an overhead electric line, which may further restrict the operation of an excavator. In addition, operating the front end loader along Helicopter Road is likely to be disruptive to Base activities. Suggest considering an alternate debris transfer area near the intersection of the North end of the westernmost proposed access road and the canal on the West side of the site. Transferring debris in this area would eliminate the need to operate equipment outside of the limits of the landfill. If the debris transfer area is left in its current location, the monitoring well on the west side of Helicopter Road should be protected with high-visibility snow fence.</p>
6	2-4	2.7.3	<p>Testing of the tank for PCBs and heavy metals is mentioned in the last sentence. Please provide more detail about the sampling method (wipe samples?) and rationale for selection of these analyses. Also discuss sampling and analysis of tank contents.</p>

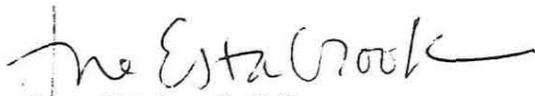
Comment Number	Page	Section or Paragraph	Comment
7	2-5	2.12	Specify the proposed seed mixture. In addition to seeding on the North Bank and along access roads, other areas of the landfill disturbed by construction activities also should be seeded.
8	3-1	3.1	Greater effort should be made to identify local disposal facilities for the concrete and wood debris. The cost to haul the waste to Elizabeth, NJ or Pittsburgh, PA will be very high.
9	4-2	4.4	OHM states here that excess stockpiles of waste and other obvious signs of site work will be removed from the site, but stated previously that cut brush will be left in place (see Comment 1). Please clarify.
10	4-2	4.5	Will fuel be stored on site (e.g. for the diesel generator and equipment) or will all refueling be done by truck? If fuel is stored on site, secondary containment will be required.
11	5-1	5.1	Please provide rationale for proposed analyses. In particular are TCL Volatiles, Semivolatiles, Pesticides/PCBs, TAL Metals, and Cyanide necessary for characterization of the waste for disposal? If this data is to be used for another purpose, different QA requirements may apply.
12	5-2	5.4	Please provide more detail about the proposed treatment system for decontamination fluids mentioned in the last sentence of this section.
<b>Quality Control Plan</b>			
13	4-1	4.0	Provide the name and qualifications of the laboratory proposed for use on the project, in accordance with Specifications Section 01115, Paragraph 1.2.1.1.f(3).
<b>Health and Safety Plan</b>			
14	2-3	2.7	For final submittal, provide name and phone number of Site Supervisor and Site Safety Officer (comment also applies to Figure 2.1).
15	3-13	Table 3.4.4	Suggest including discussion of potential hazards and hazard control measures for work on pontoon boat.

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If you have any questions regarding these comments, please feel free to call Scott MacEwen or me at 703-471-1441.

Sincerely,

CH2M HILL

A handwritten signature in black ink that reads "Anne Estabrook". The signature is written in a cursive style with a long horizontal flourish at the end.

Anne Estabrook, P.E.  
Project Engineer

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c: Ms. Kelly Greaser/NAB Little Creek/N464  
Mr. Scott MacEwen/CH2M HILL