

**MEMORANDUM****CH2MHILL****Final EE/CA for Pesticide Disposal Site- Site 5**

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**FROM:** Mike Tilchin/WDC

**DATE:** February 17, 1998

Attached please find copies of the Final EE/CA for the Pesticide Disposal Site (Site 5).  
Comments received on the draft are also included. Thanks to the Team for all of your input.

**Comment Response**  
**Draft Engineering Evaluation/Cost Analysis (EE/CA)**  
**Pesticide Disposal Site-Site 5**  
**Naval Base, Norfolk**  
**Norfolk, Virginia**

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1. An Action Memorandum is not required - revise Section 1.2 (last paragraph on page 1-4), section 3.3 (page 3-2), and anywhere else the Action Memorandum is mentioned.

*The modification will be made to Sections 1.1 and 3.3. An Action Memorandum is not mentioned anywhere else in the document.*

2. Section 2.1, 7th line: Delete "26-foot-deep". This depth has shown up in some documents but it seems unlikely that it's that deep. The February 1983 IAS, page 6-63, says a "28-inch diameter culvert placed vertically into a gravel-filled hole..."

*The modification will be made to Section 2.1.*

3. Section 2.1.1, 1st paragraph, last sentence, suggest revising the wording to clarify that the tidal influence was slight, i.e. change "...there is limited tidal influence..." to something like "...there is only very minor tidal influence..."

*The modification will be made to Section 2.1.1.*

4. Modify either Figure 1-2 or 2-1 to show locations of monitoring wells, or add a Figure like Figure E-2 in the RI report that show their location. The only monitoring well shown now is MW-04 on Figure 2-1, but Section 2.1.1 and Tables 2-1, 2-2, and 2-3 mention all the monitoring wells. Consider showing the sample locations also.

*Two additional figures will be incorporated into the document to show the Phase I and Phase II sampling locations (figures will show both the monitoring well locations and the sampling locations).*

5. Section 4.1, 3rd paragraph. The way it's written I don't think it's clear what the confirmation and characterization samples are for. Clarify that the confirmation samples will be taken from the remaining soils to confirm that soils to remain meet the cleanup levels, and that the characterization sampling will be taken for the soils being removed to verify they meet the disposal requirements. Also, write it so that the option exists to take characterization soil samples in-situ - then excavate and remove. Also, include TPH tests in the characterization tests. Here's a suggestion (feel free to improve on): "Characterization samples would be taken from the soils that are removed from the site to determine the appropriate disposal method and facility. These samples will be sent to an offsite laboratory for full TCLP, ignitability, reactivity, and corrosivity analyses, plus TPH and any additional sampling required by the disposal facility. Confirmatory soil samples would be collected from the remaining soils at the sides and bottom of the excavated area. The confirmatory samples will be sent to an offsite laboratory for pesticide analysis to verify cleanup goals have been met. If any pesticide above the cleanup levels are found in the confirmatory samples, additional excavation and confirmatory sampling/analysis would be performed until the cleanup goals are met."

*The modification will be made to Section 4.1. Similar consideration also will be given to Sections 3.5 and 6. In addition, the cost estimates for all the developed alternatives will be modified to incorporate the TPH analysis.*

6. Section 6: Revise the 3rd paragraph (and anywhere else characterization sampling is discussed) so that the option to take characterization samples in-situ is available. You can say "...excavating and testing the contaminated soil, proper staging and testing until TCLP analyses are completed, then ...". Make sure this is revised elsewhere where characterization sampling is discussed.

*The modification will be made to Section 6. Similar consideration also will be given to Sections 3.5 and 4.1. In addition, the cost estimates for all the developed alternatives will be modified to incorporate the TPH analysis.*

7. I think there is enough info on how the soils will be handled and disposed of in the EE/CA. However, before you start putting together the Work Plan to do the removal we will need to discuss details and make sure we follow the State's requirements.

*CH2M HILL will work closely with both the Navy and the State during the Work Plan preparation, to ensure that the appropriate requirements are met.*

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1. Page 1-4, 3rd paragraph, last sentence & Page 3-2, Section 3.2, 3<sup>rd</sup> sentence - Action Memorandum is not required as the EPA is not funding the removal action. Public comment will be entered into the Administrative Record in another form - Closeout report?

*The modification will be made to Sections 1.1 and 3.3.*

2. Page 3-4, Section 3.5: TPH should be a test parameter and may determine disposal requirements, assuming the soil is non-hazardous. Address in-situ soil testing to characterize the waste and soil staging requirements. Policy for soil testing, staging and disposal will be contained in the minutes of the DEQ-LANTDIV meeting of 28 January 1998.

*Section 3.5 discusses general disposal requirements, therefore the option of in-situ soil testing will be appropriate to incorporate into Section 3.5. Similar consideration also will be given to Section 6. Analyzing the excavated soil for TPH (as well as the option for in-situ soil testing) will be incorporated in Sections 4.1, under which the framework for the method of excavation is discussed. In addition, the cost estimates for all the developed alternatives will be modified to incorporate the TPH analysis.*