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**Plan**

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# Environmental Protection Plan Removal Action Site 11-School of Music Plating Shop Naval Amphibious Base Little Creek Norfolk, Virginia

Contract No. N47408-92-D-3045  
Delivery Order No. 0010

Prepared for:

Naval Construction Battalion Center  
Naval Facilities Engineering Command  
Contracts Office, Code 2723, Building 90  
Port Hueneme, California 93043-5000



Prepared by:

IT Corporation  
2790 Mossie Boulevard  
Monroeville, Pennsylvania 15146-2792

**Environmental Protection Plan  
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Norfolk, Virginia**

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## ***Table of Contents***

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List of Figures . . . . .	ii
1.0 Introduction . . . . .	1
2.0 Preconstruction Survey . . . . .	1
3.0 Air Pollution Control . . . . .	1
3.1 Air Monitoring Plan . . . . .	2
3.2 Air Pollution Control and Response . . . . .	2
4.0 Land Resources Management . . . . .	2
4.1 Historical and Archaeological Finds . . . . .	3
4.2 Survey Monuments and Markers . . . . .	3
4.3 Field Office, Staging, and Laydown Areas . . . . .	3
4.4 Stockpiles and Temporary Construction Roads . . . . .	3
4.5 Protection of Trees and Shrubs . . . . .	3
4.6 Restoration of Landscape Damage . . . . .	4
5.0 Waste Management . . . . .	4
5.1 Hazardous Waste Disposal . . . . .	4
5.2 Nonhazardous Waste Disposal . . . . .	5
6.0 Water Pollution Control . . . . .	5
7.0 Soil Erosion and Sediment Control . . . . .	5
8.0 Noncompliance/Corrective Action . . . . .	5
9.0 Postconstruction Cleanup . . . . .	6

## List of Figures

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<i>Figure</i>	<i>Title</i>
1	Removal Action Site Plan

## ***1.0 Introduction***

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This Environmental Protection Plan has been specifically developed to meet the requirements of performing work in a manner that protects the environment during the removal action.

Environmental protection, for the purposes of this project, is defined as maintaining the environment in its current state to the greatest extent possible during project construction, and the enhancement of the appearance of disturbed areas in their final condition. To accomplish this, consideration must be given to air pollution control, land resources management, waste management, noise control, and water pollution control. The IT Corporation (IT) Site Superintendent will verify that all work is performed in a manner that minimizes the polluting of air, water, or land resources and complies with appropriate federal and state regulations. The Project Manager will coordinate all land resources management, waste management, pollution control, and abatement activities with the Navy Technical Representative (NTR).

## ***2.0 Preconstruction Survey***

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Prior to beginning on-site construction, IT's Quality Control (QC) Representative and the NTR will conduct a joint condition survey of the site. The intention of this survey is to document prework site conditions, including the condition of trees and vegetation, and to identify potential environmentally sensitive areas that might be adversely impacted by construction activities. Photographs of the site will be taken to document preconstruction conditions. Mutually agreeable areas for field facilities, staging, and equipment and material laydown areas will be identified and delineated. A report of this survey will be prepared and signed by both IT and the NTR, indicating mutual agreement as to its accuracy and completeness. An environmental conditions report will then be prepared to document the physical condition of the site at the initiation of the removal action.

## ***3.0 Air Pollution Control***

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All work associated with this project will be conducted in a manner that minimizes the release of organic vapors, toxic gases, and dust. Real-time air monitoring will be conducted in the active work areas, at the project site perimeter, and at designated off-site locations to document worker exposure and to monitor the potential for off-site releases of pollutants. Monitoring will be initiated whenever the work activities create a potential for exposure

and/or whenever the required respiratory protection is Level B or Level C. No on-site burning of waste material will be conducted during this project.

### ***3.1 Air Monitoring Plan***

Real-time air quality monitoring for volatile organic compounds (VOC) and particulates will be conducted both on and off site. This monitoring will consist of personnel, work area, and perimeter monitoring. An Air Monitoring Plan has been developed for this project which describes the types and locations of samples to be collected; the sampling and analytical equipment to be utilized; the target analytes; the action levels and noncompliance response actions; and the air monitoring quality assurance (QA)/QC program. This plan has been incorporated into the site Health and Safety (H&S) Plan.

### ***3.2 Air Pollution Control and Response***

Construction activities associated with this project may result in the release of respirable particulates and VOCs. The work procedures will be designed to prevent and minimize these releases. Additionally, action levels have been developed for the initiation of control and/or response activities.

Background air concentrations for VOCs and particulates will be established on a daily basis. If real-time air monitoring for these constituents indicates levels are greater than the action levels at the downwind site perimeter, control and response activities will be initiated for abatement of the on-site source of the air pollution as detailed in the site H&S plan.

Control for fugitive particulates will involve dust control measures such as watering down dry or barren areas and roadways. During dry periods, or when visible dust is in the air, a water truck will be made available on site to remedy these conditions.

## ***4.0 Land Resources Management***

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All construction activities associated with this project will be conducted in a manner to minimize impacts to land resources within and outside the project boundaries. In particular, damage to trees and shrubs and to native wildlife habitat will be minimized to the maximum extent possible. All project activities will be coordinated with the NTR to minimize impacts to land resources. Areas to be cleared and grubbed in order to perform and support construction activities will be designated during the initial site surveys and delineated on a

site plan. Topsoil from areas to be disturbed will be stripped and stockpiled for reuse during site restoration activities. Areas which have been impacted by the project will be restored, as much as is practical, to match their original condition.

#### ***4.1 Historical and Archaeological Finds***

Any and all items discovered during construction which may have an apparent historical or archaeological interest will be carefully preserved in an undisturbed state. The Site Superintendent will immediately report the find to the NTR so that proper authorities may be notified.

#### ***4.2 Survey Monuments and Markers***

All survey monuments and markers found within the boundaries of the project site will be marked with lath and flagging prior to the start of construction to provide adequate visible site identification. Additionally, all survey monuments found within the project site area will be properly surveyed and referenced prior to the start of construction. This will enable the replacement of any monuments if they are disturbed during project activities.

#### ***4.3 Field Office, Staging, and Laydown Areas***

All trailers, staging, laydown, and parking areas will be located on the project site at approximate locations as shown on Figure 1. Proposed locations and the construction details will be formalized by mutual agreement of IT's Project Manager and the NTR.

#### ***4.4 Stockpiles and Temporary Construction Roads***

The locations of temporary laydown areas and construction roads will be decided by mutual agreement of IT's Project Manager and the NTR.

#### ***4.5 Protection of Trees and Shrubs***

IT will conduct construction activities so that trees and shrubs lying outside areas designated for clearing will not be defaced, injured, or destroyed. IT will provide temporary protection for trees, consisting of placing wooden barricades around them, if there is a possibility for injury caused by use of construction equipment and machinery.

#### **4.6 Restoration of Landscape Damage**

All areas damaged or otherwise altered by activities associated with this project will be restored, as much as practical, to near current conditions. Restoration will be as directed by the NTR in accordance with the contract documents. Trees damaged during the project will be restored, if possible, or replaced with nursery-grown trees of the same species as the damaged tree and of a size that is satisfactory to the Contracting Officer. All disturbed turf areas will be reclaimed by revegetating.

The reclamation of all areas affected by construction activities such as the field office area, decontamination area, and temporary staging/laydown areas, will be regraded to match adjacent areas. Reclamation of temporary site access roads will include smoothing and grading to eliminate ruts and to match the contours of the adjacent areas. Eroded or caved slopes of cuts or embankments will be trimmed and smoothed to provide a stable condition and adequate drainage. Revegetation of all disturbed areas will be performed in accordance with the contract documents.

### **5.0 Waste Management**

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Wastes, both hazardous and nonhazardous, will be generated by activities associated with project activities. These wastes will be properly managed to mitigate environmental impacts and comply with applicable regulations. All disposal activities will be conducted in accordance with the requirements of the contract documents.

#### **5.1 Hazardous Waste Disposal**

Solid wastes, which will be handled as potentially hazardous, include personal protective clothing; the tank contents, tank, and associated piping; and soil excavated during removal of the tank and piping. The soil and tank/piping will be segregated, placed in rolloff containers, and transferred to the designated area on site. Disposable protective clothing will be drummed for disposal as hazardous material.

Liquid wastes which are generated during the construction activities include personnel decontamination wash water, equipment decontamination water, and water generated during excavation dewatering. Contaminated water, site runoff, and water generated during excavation activities will be directed or pumped to the holding tank located within the designated temporary staging area on site.

## ***5.2 Nonhazardous Waste Disposal***

Nonhazardous waste material such as trash and general debris will be placed in a dumpster and disposed by a local waste hauler in accordance with applicable regulations.

## ***6.0 Water Pollution Control***

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All project activities will be conducted in a manner to prevent the discharge of pollutants into adjacent waterways. Control and/or disposal facilities will be utilized properly and maintained adequately to comply with applicable contract specifications. To the maximum extent possible, all toilet facilities will be of the chemical type and disposal of wastes will be to an off-site facility. No toilet facilities will be located in the Exclusion Zone.

If necessary, fuel will be stored in tanks and oil will be stored in barrels. Special precaution will be taken to prevent the contamination of groundwater or surface water from a fuel or oil spill.

## ***7.0 Soil Erosion and Sediment Control***

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Because of the nature of the site and the level of construction activities, it is not anticipated that erosion control will present any significant problems. A fabric silt fence will be installed around the perimeter of the work areas and upgradient of the drainage ditch. These silt fences should adequately control erosion problems. If necessary, diversion dikes or ditches will be installed and regrading conducted to control sediment migration. The existing catch basin within the work area will have straw bales placed around its perimeter to minimize the possibility of an uncontrolled discharge of sediment.

All erosion and sediment control measures will be properly maintained throughout the duration of the project. In all cases, the area of bare soil exposed at any given time by construction activities will be kept to a minimum and reseeded as soon as possible to minimize erosion potential.

## ***8.0 Noncompliance/Corrective Action***

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Upon written notification from the NTR of any noncompliance with federal and state laws and regulations, IT's Project Manager will immediately initiate actions to correct the noncompliance situation. The Project Manager will inform the NTR in writing of the

proposed corrective actions and will verify that the actions are implemented immediately and effectively. After the noncompliant situation has been eliminated, the Project Manager will send written notification to the NTR of the results of the corrective action.

**9.0 Postconstruction Cleanup**

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Upon project completion and subject to instructions by the NTR, IT will remove all temporary construction facilities, stockpiles of excess material, and any other vestiges of construction activity. As directed by the NTR, disturbed areas will be regraded and seeded in accordance with the construction specifications to return them to their preconstruction condition.

