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757-322-4751

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FEB 23 1999

Commonwealth of Virginia
Attn: Ms Lisa Lillis
Department of Environmental Quality,
Tidewater Regional Office
5636 Southern Blvd.
Virginia Beach, VA 23462

Re: Confirmation of Discussions regarding the
Site 13 PCP soil Removal Action at Naval
Amphibious Base, Little Creek, Virginia Beach, VA

Dear Ms. Lillis:

The purpose of the Navy's IR program is to identify, assess, characterize and clean up or control contamination from past waste management activities at Navy facilities. As you are aware, the Navy intends to excavate approximately 270 cubic yards of PCP contaminated soils as part of a removal action under the Navy's Installation Restoration (IR) program. Under the Navy's CERCLA authority, we are required to conform to Resource Conservation and Recovery Act (RCRA) regulations as Applicable or Relevant and Appropriate Requirements (ARARs). In discussion with Mr. Robert Weld of your Richmond office, he has instructed us to coordinate any RCRA regulations on this removal action with your office.

The Navy has determined that the soil at this site has been contaminated from past wood preserving operations and the contaminated soil and ground water will be disposed of as a listed (F032) hazardous waste. The Navy, utilizing their Remedial Action contractor (OHM/IT) will be removing PCP contaminated soil from Site 13 at NAB Little Creek and disposing of it as hazardous (F032) waste. The limits of the area to be excavated require the removal of PCP contaminated soil located below the ground water table, which creates problems with disposal of the soil. Since disposal facilities will only accept soil that passes the paint filter test, we will have to dry the soil on-site prior to disposing of it. It is our intention to place the wet soil in a roll-off with a valve, drain and

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Amphibious Base, Little Creek, Virginia Beach, VA

containerize the water, and then add a drying agent if necessary to the soil so that the soil will pass the paint filter test. Both soil and water will be disposed of as hazardous (F032) wastes.

The following guidance has been received from your office and will be incorporated into OHM/IT's Work Plan, as well as the Waste Analysis Plan:

1. Provided that we meet the requirements of Virginia Hazardous Waste Management Regulations, Section 15.1.G.1.d., the Navy is allowed to dry out the soil on-site without a permit in an accumulation container". Please note we are treating the soils to meet disposal requirements, and not to meet LDR treatment standards.
2. A "roll-off" with a top can be utilized as an accumulation container. The accumulation container will remain covered, except when the soil and/or drying agent is being added or taken out. A drain with a valve will be attached to the bottom of the accumulation container to facilitate water removal. This drain valve will remain closed, except for when the water is required to be drained off.
3. The drying agent (either cement or fly-ash) will have to be added to the soil and mixed in the accumulation container. Once the soil has been treated in the accumulation container, the soil can be transferred from the accumulation container into a vehicle for transport/disposal purposes. Further treatment in another container is prohibited.
4. Transportation will be provided by permitted hazardous waste transporters and their vehicles shall meet all DOT regulations, with approved drivers, placards, manifest, etc.
5. The Navy will submit a copy of OHM/IT's Work Plan to EPA, VDEQ Richmond, and VDEQ TRO for their review and approval.
6. In addition, the Navy will submit a Waste Analysis Plan (WAP) to VDEQ-TRO for their review and approval, a minimum of 30 days prior to the start of excavation. This WAP will be submitted along with OHM/IT's Work Plan. Since we have declared this material (water and soil) an (F032) waste, and will not be trying to change the classification of the material from a hazardous to non-hazardous material by treatment on site, the WAP will be a relatively short 2-3 page work plan. The WAP will discuss the extent of soil contamination, how the material will be excavated, the "soil

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drying process", sample results, testing required for disposal purposes, transportation requirements, and disposal facilities. The chemical/physical analysis part of the WAP will not be required unless we plan to use fly-ash from NAB Little Creek's power plant as a drying agent. If this fly-ash is used, we will include past TCLP test results (1984, 1993, 1995 and 1996) as well as a statement that, using our generator knowledge, these past test results are representative of the existing fly-ash material.

OHM/IT's Work Plan, along with the WAP, is scheduled to be mailed out on 24 February 1999, and should reflect the information provided above. We have tentatively scheduled the excavation of the contaminated soils to begin on 25 March 1999.

We have greatly appreciated the information that your office has provided to us in support of this project. Should you have any questions or comments on either of the documents, please feel free to contact Mr. Bob Schirmer, P.E. at (757) 322-4751.

Sincerely,

N.M. JOHNSON, P.E.
Head
Installation Restoration Section (North)
Environmental Programs Branch
Environmental Division
By direction of the Commander

Copy to:

NAVHIBASE Little Creek (Attn: Code N464, Ms. Kelly Greaser)
VDEQ (Attn: Mr. Robert Weld)
EPA Region III (Attn: Mr. Bruce Beach)
CH2m Hill (Mr. Scott MacEwen)
WPNSTA Yorktown (Attn: Ms. Carolyn Neill)

Blind copy to:

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ADMIN RECORD

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