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NCBC DAVISVILLE
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LETTER AND COMMENTS FROM RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL
MANAGEMENT REGARDING DRAFT SAMPLING AND ANALYSIS PLAN TO SUPPORT THE
FEASIBILITY STUDY FOR SITE 16 NCBC DAVISVILLE RI

04/05/2010

RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT



RHODE ISLAND

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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TDD 401-222-4462

5 April 2010

Mr. Jeffrey Dale
US Department of the Navy
BRAC PMO, Northeast
4911 South Broad Street
Building 679, PNBC
Philadelphia, PA 19112

RE: NCBC Site 16
Navy Response to RIDEM Comments
Draft Sampling & Analysis Plan to
Support the Feasibility Study
Davisville, Rhode Island
Submitted 18 February 2010, Dated 18 February 2010

Dear Mr. Dale:

The Rhode Island Department of Environmental Management, Office of Waste Management (RIDEM) has reviewed the above referenced document and has the following comments to offer:

1. Page 90, Section 14.1.18, IDW Handling, Characterization and Disposal – This section states that IDW will be handled in accordance with Tetra Tech SOP SA-7.1. The IDW must also be handled in accordance with RIDEM Division of Site Remediation Policy Memo 95-01.

Navy Response – *Agree. The final sentence of Section 14.1.18 will be changed to read as follows: "IDW will be managed in accordance with Tetra tech SOP SA-7.1 (see Appendix A) and RIDEM Division of Site Remediation Policy memo 95-01 (as applicable). IDW characterization will be performed after all IDW has been containerized at a secure location determined by the FOL with subsequent disposal based on characterization results."*

RIDEM Comment – Response is acceptable.

2. Page 123, Section 17.6, Problem #5, Investigation of Vapor Intrusion Potential at Periphery of CVOC Plume, Paragraph 1, Sentence 1 – This sentence states that 10

temporary wells will be placed along transects covering locations close to the Sea Freeze and NORAD buildings (Figure 17-4) to investigate the potential of vapor intrusion. For completeness it is recommended that an additional temporary well location be placed in between locations SB16-A2-32 and SB16-A2-15.

Navy Response – *The intent of Problem #5 is to investigate potential vapor intrusion issues at the periphery of the CVOC plume where existing buildings are present. There are no existing (or planned) buildings at the RIDEM proposed location; therefore, it is unclear how the data collected from this proposed temporary well location would be utilized to assess potential vapor intrusion issues.*

RIDEM Comment – Plans have a way of changing. With respect to Site 16, plans have ranged from boat storage facilities to restaurants and hotels at the marina. At Allen Harbor Landfill it was not anticipated that homes would be built behind the landfill yet they are there today. It is agreed that the current plans for the area in question do not call for any additional construction between the NORAD building and Sea Freeze, but that could also change. From the southern most sampling point at the NORAD building to the Northern most sampling point at the Sea Freeze Building is an approximate 800' gap. For completeness (and so we do not need to return to the site in the event plans change) it is suggested that a sample be taken somewhere mid-range between these buildings since we are out there anyway. If it is an issue of cost the northern most sample location could be exchanged for this location.

3. General Comment - Sediments along the shoreline of Allen Harbor, particularly along the length of Allen Harbor Road need to be collected and analyzed to determine if any unacceptable risk exists at the site. While it is acknowledged that today there is minimal contact with the sediments by humans, that could change in the future depending upon how the marina develops. Two to three samples analyzed for the full suite of contaminants (VOC, SVOC, PCBs, Pesticides and metals) would be sufficient to address this concern.

Navy Response – *The requested sampling and analysis has already been conducted. Sediment samples collected from 20 Allen Harbor locations.....*

RIDEM Comment – Response is acceptable.

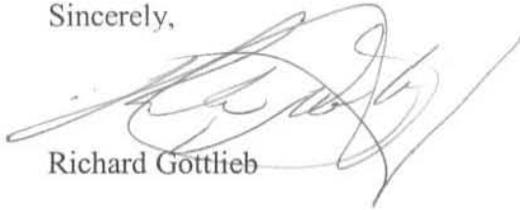
4. General Comment – Similar to above, both surface and sub-surface soil samples should be taken in the same area and analyzed for the full suite of contaminants. Two to three samples would be sufficient to address this concern.

Navy Response – *Soil Samples have already been collected along the northern boundary of the Site 16 North Central Area during the Phase III investigations (the southern shoreline of Allen Harbor) as depicted in Figure 2-2 of the Phase III RI report.....*

RIDEM Comment - RIDEM was requesting soil samples along the eastern shoreline along Allens Harbor Road. However; upon further review of the data there does not appear to be any exceedances in the vicinity of the northeast portion of the north central area. Therefore the response is acceptable.

RIDEM would like to thank you for the opportunity to comment on this request and looks forward to working with the Navy and USEPA. If you have any questions or require additional information please call me at (401) 222-2797 ext. 7138 or email me at richard.gottlieb@dem.ri.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard Gottlieb', written over a horizontal line.

Richard Gottlieb

Cc: M. Destefano, DEM OWM
C. Williams, EPA Region 1
D. Barney, BRAC Environmental Coordinator
S. King QDC
S. Licardi, ToNK
S. Vetere, TtNUS