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LETTER AND COMMENTS FROM RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL
MANAGEMENT ON U S NAVY RESPONSE TO COMMENTS REGARDING DRAFT FINAL
OUTFALL 001 SOIL CONFIRMATORY SAMPLING AND DRAIN LINE INVESTIGATION NCBC
DAVISVILLE RI
09/10/2010
RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT



RHODE ISLAND

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

10 September 2010

Mr. Jeffrey Dale, RPM
BRAC PMO Northeast
4911 South Broad Street
Bldg 679, PNBC
Philadelphia, PA 19112

RE: Draft Final Outfall 001 Soil Confirmatory Sampling &
Drain Line Investigation
Naval Construction Battalion Center
Davisville, Rhode Island
Submitted 1 September 2010, Dated August 2010

Dear Mr. Dale:

The Rhode Island Department of Environmental Management, Office of Waste Management (RIDEM) has reviewed the above referenced document. The following are comments which have not been addressed from our 13 October 2009 letter to you. All other comments were satisfactorily addressed:

1. **Comment 2 --- Page 15, SAP Worksheet #7 Personnel Responsibilities and Qualifications Table** – It is pointed out that Matt Soltis is the Health and Safety Manager, however, there is no Health and Safety Plan (HASP) in the document. Either provide the plan or reference the HSAP the Navy is using for this investigation.

Navy Response: *Tetra Tech, on behalf of the Navy, has prepared a site-specific HASP in accordance with 29 CFR 1926.65, paragraph (b) (4) for this project. The HASP is dated September 2009 and could be made available for review if requested by RIDEM.*

RIDEM Comment: Response is acceptable. Please provide a copy of the HASP for RIDEM's files.

RIDEM Comment – To date RIDEM has not received a copy of the HASP.

2. **Comment 5 -- Page 33, Section 11.6, Optimize the Sample Design, Paragraph 2, Sentence 3** – This sentence states that each sample will be a composite of five soil aliquots. RIDEM, with a few exceptions, does not accept compositing of soil samples, especially where VOCs are being evaluated. Please revise this sentence to reflect that discreet samples will be collected and biased towards suspected areas of contamination.

Navy Response: *Sidewall samples will consist of soil aliquots collected from five locations along a single line extending from the top of the excavation to the bottom. The Navy is not proposing to composite VOC samples.*

RIDEM Comment: RIDEM does not except composite soil samples for this type of confirmatory sampling. Please revise the work plan to reflect that discreet samples will be obtained.

RIDEM Comment – Per our 9 September 2010 conference call the Navy has agreed to take discrete samples.

3. **Comment 12 -- Page 33, Section 11.6, Optimize the Sample Design, Paragraph 4, Sentence 3** – Samples are proposed to be collected from the 3 to 5-foot depth interval bgs. If the pipe is assumed to be at least 3.5' bgs then the sample should be collected from below 3.5' bgs. It is assumed that this is a gravity pipe (i.e. not a force main). Please explain how the Navy knows that this pipe is no more than 3.5' below ground surface. It is quite possible that at some locations the pipe is more than 5' bgs because of gravity flow considerations. If the Navy is only going to take a sample up to a maximum depth of 5' the sample should show nothing as it would be above the pipe.

It is assumed the Navy has plans of the drain pipe. Given the 1,000 foot length there should be manholes for maintenance purposes. The manholes would show invert elevations. Comparing the invert elevations to a topographic map one could determine the depth to the pipe and thus know how far below ground surface the sample should be taken from. This procedure should be incorporated into the SAP once sampling locations are determined. Incidentally, RIDEM requested a copy of the drainage pipe plans in its 9 February 2009 comments on the Draft Characterization Report. These plans are not contained in this SAP. Please provide.

Navy Response: *The depth/location of the pipe will be identified by test pitting to ensure soil samples are collected from an appropriate depth.*

RIDEM Comment: With respect to the depth of sampling the response is acceptable, though the Navy has not addressed the issue of providing plans of the drainage line. Please provide a copy of the drainage line plans.

RIDEM Comment: This Section, now labeled as 14.1.4, now assumes a depth of three to five feet. It should state that samples will be collected from below the elevation of the bottom of the pipe. Most backhoes can excavate to a depth of 12 feet. Please explain why the Navy is using one which can only excavate to a depth of eight feet. In addition, RIDEM requested a copy of the as-built plans which have not yet been received.

4. **Comment 14 -- Work Sheet #25** – Analytical Instrument and Equipment Maintenance, Testing, and Inspection Table – The accuracy of equipment should be tested after the last use of the day to insure the equipment is still accurate. This should be incorporated into this worksheet.

Navy Response: The frequency of monitoring listed in Worksheet #25 for the performance of the ICP-AES, ICP-MS, and Mercury Analyzer instruments via calibration verification and calibration blank; and of the GC-ECD and GC-FID instruments via continuing calibration verification will be revised to "Daily, after every 10 samples, and at end of run." Calibration verification of the GCMS instrument at end of run or end of day is not required by Method 8270D or the DoD Quality Systems Manual for Environmental Laboratories.

RIDEM Comment: Response is acceptable.

RIDEM Comment: The change to Work Sheet 25 has not been made.

5. **Additional Comment -- Page 35 of 107, Section 14.1.7 IDW** – Please be advised that Investigative Derived Waste (IDW) must also be handled in accordance with RIDEM Policy Memo 95-01 Guidelines for the Management of Investigation Derived Wastes.

RIDEM would like to thank you for the opportunity to comment on this document 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,



Richard Gottlieb

Cc: M. Destefano, DEM OWM
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