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LETTER REGARDING RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL  
MANAGEMENT COMMENTS ON MAINTENANCE CLEANING WORK PLAN FOR QUONSET  
DEVELOPMENT CORPORATION OUTFALL 001 NCBC DAVISVILLE RI  
7/19/2013  
RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT



RHODE ISLAND  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

19 July 2013

Mr. Jeffery Dale, RPM  
U.S. Department of the Navy  
BRAC PMO, Northeast  
4911 South Broad Street  
Building 679, PNCB  
Philadelphia, PA 19112

RE: QDC Outfall 001 Maintenance Cleaning Work Plan  
Naval Construction Battalion Center  
Davisville, Rhode Island  
Submitted 14 June 2013, Dated 14 June 2013

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 4, Section 1.3, Overview of Planned Maintenance Activities, Bullet 2 – this bullet notes the installation of a temporary haul road. Please coordinate with Rhode Island CRMC on construction of said temporary haul road as it must comply with the Rhode Island Storm Water Design & Installation Standards Manual, December 2010.
2. Page 4, Section 1.3, Overview of Planned Maintenance Activities, Bullet 3 – Please describe the secondary containment that will be used to capture the water and residual material that is washed from the final catch basin and where it will be located in relation to the drain line.
3. Page 8, Section 3.3, Permits and Approvals – This section notes that permits and approvals from federal, state, or local governments are not required for the work covered under this plan. Please be advised that CRMC has certain requirements for the construction of temporary haul roads within its jurisdiction and approval from CRMC may be required. Please coordinate with David Reis of CRMC at 401-783-7365 prior to executing the work plan.

4. Page 8, Section 3.4, Waste Management – This section states that there will be 18,000 gallons of water of which 10% will be residual material. It is not entirely clear what residual materials are, but it is assumed it is solids. This will generate almost 9 cubic yards of solid material to be disposed of. This section also states that the waste stream is assumed to be non-hazardous. Please state if the Navy is going to sample to confirm the assumption. Based on the May 2011 Drain Line Investigation and Data Report for Outfall 001 each catch basin had exceedances for VOCs, SVOCs except CB-09, PAHs except CB-09, TPH except CB-09 and Metals except CB-02. Please state how both the solid and liquid fractions are going to be stored until disposed of.
5. Page 9, Section 3.5, Site Security – This section states that the site is located in a secure area. Please state what makes it secure. The site is adjacent to a parking lot that is used by recreational visitors to Allen Harbor Landfill and Calf Pasture Point. The concern is that some of the visitors may be curious as to what is going on at the site and venture over to check out the work since access is fairly easy. RIDEM personnel park at this lot when they inspect this site.
6. Page 13, Section 4.7, Decontamination – please note that IDW should be handled in accordance with RIDEM’s Policy Memo 95-01 “Guidelines for the Management of Investigative Derived Wastes”.
7. Section 5.2, Maintenance Cleaning – Please confirm if the drain lines that lead into CB-03 and CB-09 are also going to be cleaned. Based on section 5.0 there are 9 identified catch basins and 1600 feet of drainline to be cleaned. The text seems to indicate that these catch basins and drain lines will be cleaned as the length of pipe is approximately 1600’ (including drainlines into CB-03 and CB-09), but the number of catch basins do not seem to add up.
8. Page 16. Section 5.4, Site Restoration – This section states that the site will be restored to pre-existing conditions. Section 5.1.2 (Construction of Temporary Haul Road) notes that the temporary haul road may be left in place for future RI work. This should be mentioned in this section including who will make the determination to retain the road and who will have responsibility for ultimately restoring the area back to its original condition once the use of the temporary haul road has ended.

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](mailto:richard.gottlieb@dem.ri.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard Gottlieb', with a long, sweeping flourish extending to the right.

Richard Gottlieb, P.E.  
Principal Engineer

Cc: M. Destefano, DEM OWM  
D. Reis, CRMC  
C. Williams, EPA Region 1  
D. Barney, US Navy  
S. King, QDC  
S. Licardi, ToNK  
L. Sinagoga, Tetra-Tech