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LETTER AND COMMENTS FROM RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL
MANAGEMENT REGARDING ADDITIONAL GROUNDWATER SAMPLING SITE 2 AND 3 FOR
TPH DELINEATION SAMPLING AND ANALYSIS PLAN NCBC DAVISVILLE RI
1/23/2014
RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT



RHODE ISLAND

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

23 June 2014

Mr. Jeffery Dale
BRAC PMO Northeast
4911 So. Broad Street
Bldg. 679, PNBC
Philadelphia, PAS 19112

RE: TPH Delineation at CED Area Site 3 and
Additional Groundwater Sampling at Sites 02 & 03 and
The Drum removal Area
Sampling and Analysis Plan
Naval Construction Battalion Center
Davisville, Rhode Island
Submitted 27 May 2014, Dated 23 May 2014

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:

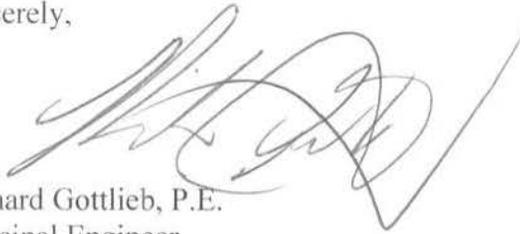
1. **Page 17 of 82, Section 4.1, Site Descriptions and History, Site 02, Paragraph 1** – This paragraph states that a removal action included the collection of confirmation samples to ensure that cleanup criteria were met for lead and TPH. Please note in this paragraph that both lead and TPH were left in place that exceeds the RIDEM Industrial/Commercial Direct Exposure Criteria. There is also one sample (02-SS17) which exceeds RIDEM GB Leachability Criteria and six that exceed the GA Leachability Criteria (02-SS16 through 20 which included one duplicate sample). For lead this was documented in a letter dated 23 September 1996 from Richard Gottlieb of RIDEM to Philip Otis of the Navy. Please revise this paragraph accordingly.
2. **Page 19 of 82, Section 4.4, Potential Migration Pathways and Exposure Potential, Paragraph 1** – This paragraph states that it is unlikely, but possible that a building may be constructed atop the area being investigated. Please remove this statement as QDC has divided this area up into a number of parcels (see Plat Map 191, North Kingstown, RI) with the intent of developing each parcel which in most instances would include building construction.

3. **Page 20 of 82, Section 5.1, Problem Statements, Problem 3, Characterization of Vapor Intrusion Potential at Sites 02/03** – This paragraph states that the “FFS is for CED Area soils and does not require an understanding of the potential for vapor intrusion”, but further on in the paragraph it states that “data must be collected from select CED Area shallow-zone wells to support an evaluation of the potential for vapor intrusion”. Please clarify as the former statement sounds as if understanding vapor intrusion is not necessary, but the latter statement implies that understanding vapor intrusion is necessary. Please note that vapor can also come from soils, i.e. it is not limited to what is in groundwater.
4. **Page 24 of 82, Section 5.3, Site Boundaries, Problem 1, Delineation of TPH-Contaminated Soil at Site 03, Paragraph 1** - For Site 03 please explain what the difference is between soil contaminated by site operations and soil not contaminated by site operations and how one is going to tell the difference between the two.
5. **Page 28 of 82, Section 7.1, Soil Borings at Site 03, Paragraph 2** – This paragraph references Figure 7-1 which delineates where a DPT rig will be used to advance shallow soil borings at 35 locations. Please provide the figure.
6. **Page 28 of 82, Section 7.1, Soil Borings at Site 03, Paragraph 3** – This paragraph states that TPH- DRO will be measured from C₉ to C₄₀ which is adequate for DRO. For total TPH, GRO, from C₇ to C₁₂, also needs to be measured. This comment also applies to the same reference on page 31 of 82, paragraph 1. Please include this in the work plan.
7. **Page 33 of 82, Table 7-1, Wells Identified for Additional Sampling** – It is not clear what the suggested EPA wells (MW03-03S, MW02-11S, MW02-03S) are going to be sampled for. Wells MW02-11S and MW02-03S should at minimum be sampled for metals and naphthalene. MW03-03S should be sampled at minimum for metals and TPH.
8. **Page 34 of 82, Section 8.1, Field Project Tasks, Mobilization/Demobilization and Utility Clearance, Paragraph 2** - This paragraph references IDW. Please reference that IDW, at minimum, should be handled in accordance with RIDEM’s IDW Policy Memo 95-01. This policy memo is noted on Page 38 of 82 (Investigation-Derived Waste Management), but should also be referenced in this section.
9. **Page 43 of 82, Section 8.2, Field SPOS Reference Table, SOP-15, Management of Investigative Derived Waste** - See Comment #8.
10. **Pages 44 – 47 of 82, Table 8-1, Sample Details Table** - See Comment #6.
11. **Pages 48 – 49 of 82, Table 8-2, Analytical SOP Requirements Table** – For TPH see Comment #6.

12. **Page 50 of 82, Table 8-3, Field Quality Control Sample Summary Table** – See Comment #6.
13. **Pages 51 – 61 of 82, Section 9.0 Reference Limits and Evaluation Tables** – Where the detection limit is greater than the project screening level please explain how a non-detect will be used in terms of determining whether there is an exceedance of the project screening level or how it might be used in then possible performance of a risk assessment.
14. **Pages 68 and 69 of 82, Section 11.0, Laboratory QC Samples Tables** – This section is for TPH-DRO (C9-C40). We also need to include TPH-GRO (C7-C12). Please add.

RIDEM would like to thank you for your consideration of this matter 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, P.E.
Principal Engineer

Cc: M. Destefano, DEM OWM
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