RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767 TDD 401-831-5508

30 September1999

Mr. Peter Hugh, Engineering Manager
U.S. Army Corps of Engineers
New England District
696 Virginia Road
Concord, MA 01742-2751

RE: Draft Work Plan – Characterization of CVOC Contamination at the
Former NIKE PR58 Site and
Adjacent Navy NCBC Davisville Site 03
North Kingstown, Rhode Island

Dear Mr. Hugh;

The Rhode Island Department of Environmental Management, Office of Waste Management (RIDEM) has reviewed the above referenced document and comments are attached.

If you have any questions or require additional information please call me at (401) 222-2797 ext. 7138.

Sincerely,

Richard Gottlieb, P.E.
Principal Sanitary Engineer

Attachment:

cc: W. Angell, DEM OWM
C. Williams, USEPA Region 1
E. Klawitter, US Navy
S. Licardi, ToNK
R. Davis, ACOE-NED
H. Cohen, RIEDC
W. Davis, CSO NCBC
J. Shultz, EA Engineering

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RIDEM Comments for:

Draft Work Plan
Characterization of CVOC Contamination at the
Former NIKE PR-58 Site and Adjacent Navy NCBC Davisville Site 03
North Kingstown, Rhode Island

Submitted 17 September 1999, Dated September 1999

1. **Page 4-2, Section 4.4, Drilling and Subsurface Soil Sampling; Bullet 1.**

   Filter packs for wells must be in accordance with Rhode Island Groundwater Regulations.

2. **Page 4-3, Section 4.4.l, Soil Boring and Sampling; Paragraph 1, Last Sentence.**

   The PID should be calibrated at the end of the day to insure that the last measurements taken are acceptable.

3. **Page 4-4, Section 4.4.1, Soil Boring and Sampling; Item c.**

   This item states that refusal will be determined if there is no appreciable movement in ten successive blows to the split barrel sampler. Typically RIDEM considers refusal at 50 blows. Please revise the criteria.

4. **Page 4-10, Section 4.5.2.2, Filter Pack; Paragraph 1.**

   Filter packs must be in accordance with Rhode Island Groundwater Regulations. Please include this statement in this section.

5. **Page 4-16, Section 4.7.3, Groundwater Sampling; First Bullet.**

   This bullet states that groundwater will be sampled for ferrous iron in the field. Please be advised that past studies have shown exceedences of RIDEM GA groundwater standards in both the NIKE and NCBC Site 03 sites. To full characterize the site, and a possible remedy, inorganic constituents also need to be sampled for. Please add this to the scope of work.

6. **Page 4-24, Section 4.12.1, Drill Cuttings; Paragraph 1.**

The paragraph states that drill cuttings that exhibit headspace PID readings less than or equal to 10 ppm will be spread on the ground in the immediate vicinity of the borehole where generated. Please be advised that prior to spreading on the ground the cuttings must meet RIDEM Remediation Regulations residential criteria. Therefore, analytical results will be required; i.e. the PID reading will not be sufficient in the determination of whether the cuttings can be spread on the ground. Please revise the work plan accordingly.

7. **Page 4-25, Section 4.12.2, Development/Sampling/Purge Water; Whole Section.**

Please be advised that groundwater which exhibits a headspace PID reading greater than 10 ppm may be vented to the atmosphere to reduce the reading. Upon a headspace reading of less than 10 ppm the water may then be discharged to the ground in the immediate vicinity from where it was extracted

8. **Attachment 2, Soil Gas Study.**

This study calls for up to 10 sample points utilizing a vacuum source. Please be advised that this number of sample locations may not be sufficient for the designated area. Furthermore, since the samples will be analyzed in the field the final number of sampling locations should be dictated by field results. Please modify the work plan accordingly.

9. **Attachment 2, Soil Gas Study.**

The work plan should specify that the soil gas survey cannot be implemented during or within 24 hours after a precipitation event as this will affect the results.

10. **General Comment.**

Please state what procedures will be used to prevent cross-contamination of CVOC from the soil to the bedrock.