



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

Department of Environmental Management
DIVISION OF SITE REMEDIATION
291 Promenade Street
Providence, R.I. 02908-5767

11 January 1996

Mr. Philip Otis, P.E., Remedial Project Manager
US Department of the Navy, Northern Division
Code 18, Mail Stop #82
10 Industrial Highway
Lester, PA 19113-2090

RE: Draft Workplan for Site 02 and Study Area 4
Naval Construction Battalion Center, Davisville, RI
Submitted 19 December 1995

Dear Mr. Otis;

The Rhode Island Department of Environmental Management (RIDEM), Division of Site Remediation has reviewed the above referenced document. Comments are attached.

If you have any questions or require additional information please call me at (401) 277 3872 ext. 7138.

Sincerely,

Richard Gottlieb, P.E.
Principal Sanitary Engineer

cc: W. Angell, DEM DSR
C. Williams, EPA Region 1

COMMENTS FOR:
DRAFT WORKPLAN FOR:
SITE 02 AND STUDY AREA 4 AT
NAVAL CONSTRUCTION BATTALION CENTER (NCBC)
DAVISVILLE, RHODE ISLAND
DECEMBER 1995

1. General Comment:

Please note that RIDEM must be notified at least one week in advance of activities that will be undertaken in the field and at least 24 hours in advance of any cancellations for work in the field. The use of weekly progress reports (usually prepared by the contractor), which include upcoming events, has worked well on other sites when they have been submitted to RIDEM for notification purposes.

2. Figure 2-2.

The contractor appears to have completed their work after the completion of the final report. This task is anticipated to last one month. This does not allow sufficient time for regulatory review and revisions, if necessary. Therefore, the time allotted for this task should be increased to an appropriate level.

**3. Page 3-1, Section 3.2, Permitting Activities, Air Pollution Control:
Paragraph 1, Sentence 2.**

RIDEM is responsible for issuing any air emissions permits required for point source air discharges.

Please note that RIDEM is not responsible for issuing permits, but rather that in this case the Navy is responsible for obtaining any necessary permits. Since this is a NPL site the Navy, however, need only meet the substantive requirements of the necessary permits.

**4. Page 3-2, Section 3.2, Permitting Activities, Clean Water Act;
Paragraph 2.**

Please note that in Rhode Island the NPDES permit is referred to as the RIPDES (Rhode Island Pollution Discharge Elimination System) permit.

5. Page 3-2, Section 3.2, Permitting Activities.

Please note that National Environmental Protection Act should be National Environmental Policy Act.

6. Section 3.2, Permitting Activities.

Please state if wetlands are within 200 feet of either site. If they are, then the Rhode Island Rules and regulations for Wetlands will apply.

7. Page 3-3, Section 3.3, Excursion and release Reporting.

Please explain what "Excursion" means in this title.

8. Page 4-2, Section 4.1, Quality Organization, Site Quality Control Manager;

As noted in comment 1, RIDEM must be notified in advance of activities which are occurring in the field.

9. Table 4-1, Test Plan and Log.

The "frequency of testing" column notes that all tests will be done on an as needed basis. This section must state the numerical frequency of testing so the regulators can ascertain if sufficient sampling will occur.

**10. Page 5-3, Section 5.1, Site 02 Excavation and Material Handling, Excavation Procedures;
Bullets 2 and 5.**

Stockpiled materials from the excavation must be covered to prevent materials from leaving the site. In addition EPA considers lead free soil to contain less than 400 ppm lead. The last sentence indicates that excavation of soil will be discontinued when lead levels are below 500 ppm. This should be changed to 400 ppm.

**11. Page 5-4, Section 5.1, Site 02 Excavation and Material Handling, Excavation Procedures;
Bullets 1.**

In addition to the strategies noted for locating underground utilities, it may be useful to contact Dig Safe prior to the start of any excavation.

**12. Page 5-6, Section 5.2, Study Area 4 Excavation and Material Handling, Excavation Procedures;
Bullet 2.**

This section notes that excavation will be complete when confirmatory sampling indicates that remaining soil has TPH levels of less than 500 ppm. This is acceptable if the land use is going to be strictly industrial. If the land use, however, could be commercial than TPH levels of 300 ppm and less are acceptable. A risk analysis which demonstrates that a TPH level of 500 ppm is acceptable for commercial use can be used in lieu of the stated values.

**13. Page 5-6, Section 5.2, Study Area 4 Excavation and Material Handling, Excavation Procedures;
Bullet 4.**

See comment 11.

14. Page 6-1, Section 6.0, Demolition, Drywell Chamber and Piping Removal and Disposal Plan;

Paragraph 2, Sentence 3.

Please explain how any liquid found in the piping will be handled to prevent contamination of the surrounding environment.

14. Page 6-1, Section 6.0, Demolition, Wooden Rack Disposal Plan; Paragraph 1, Sentence 2.

Please explain what is meant by "amended water".

15. Page 8-2, Section 8.3, Wastewater and Sediment; Bullet 1.

Please state what height bottles will be used to collect the wastewater samples.

16. Page 8-3, Section 8.4, Backfill Material; Paragraph 1, Sentence 2.

Please note that a TPH of less than 500 is acceptable for industrial use land. If the land is to be used for commercial purposes, then a TPH level in excess of 300 ppm is unacceptable. Please refer to comment 12.

17. Page 8-4, Section 8.5, Site 02 Objective, Initial Waste Characterization; Paragraph 1.

Prior to extracting liquid wastes it should be determined if the wastes are in layers (such as oil over water). If so, then samples should be taken of each layer. In addition, more than one sample should be taken of soil, sediment, and liquid. In addition in paragraph 2 please provide the project specifications which state the actual number of soil samples to be taken.

18. Page 8-4, Section 8.5, Site 02 Objective, Sampling Quality Control; Bullet 1.

Please note that if less than 10 samples are taken one duplicate sample will still be required. In addition, please state how it can be assured that the laboratory testing the samples will be unaware of which sample is a duplicate sample given the proposed sample designations.

19. Page 8-5, Section 8.6, Study Area 4, Objective; Paragraph 1, Sentence 2.

Please refer to comment 12.

20. Page 10-1, Section 10.0, Site Assessment (Closure) Report. Last Paragraph, Last sentence.

Please explain why no conclusions and recommendations will be provided.