



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

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

20 September 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: Work Plan - Site 10 Debris Removal, Building 1-11 Removal of Lead Dust, Calf Pasture
Point Munitions Bunker Lead Clean Up, Removal of lead Contaminated Soils
Naval Construction Battalion Center, Davisville, Rhode Island
Submitted 20 August 1996

Dear Mr. Otis;

The Rhode Island Department of Environmental Management (RIDEM) Division of Site Remediation has reviewed the above referenced report and comments are attached. Upon satisfactorily responding to these comments this work may proceed.

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

Attachment

cc: W. Angell, DEM DSR
C. Williams, EPA Region 1
H. Cohen, RIEDC
M. Cohen, ToNK

letter1.rwg/richg

Comments for:

**Work Plan
Site 10 Debris Removal
Building 111 Removal of Lead Dust
Calf Pasture Point Munitions Bunker Lead Clean Up
Removal of Lead Contaminated Soils
Naval Construction Battalion Center
Davisville, Rhode Island**

Submitted 20 August 1996

1. Table 2-1, Test Plan and Log.

For Calf Pasture Point Munitions Bunkers # 59 and 60 the frequency of sampling is stated to be 4 samples/bunker for both the wipe sampling and the confirmatory sampling. There should be a minimum of at least 6 samples for each bunker which would include the four walls, ceiling, and floor.

2. Table 2-1, Test Plan and Log.

For item 4 (Backfill Material Analytical Testing - Soil) it is proposed to do TCLP. If this is the case then the criteria would be 5 mg/l not the 100 ppm shown. In addition, backfill material should have no more than 150 mg/kg total lead. Please correct.

3. Table 2-1, Test Plan and Log.

For Topsoil Material for both geotechnical testing and analytical testing the criteria to be used is "Navy Spec 02921". Please provide a description of this spec as well as Navy Spec 02315. As noted above the topsoil should contain no more than 150 mg/kg total lead.

**4. Page 4-1, Section 4.1, Mobilization;
Paragraph 3.**

This paragraph lists agencies to contact to identify buried lines and utilities. In addition to those listed DIG SAFE should also be called. Their telephone number is 1-800-225-4977.

**5. Page 4-1, Section 4.3.1, Heavy Equipment Decontamination;
Paragraph 1, Sentence 2.**

This sentence states that the decon pad will be constructed of polyethylene sheeting. It should be stated that the polyethylene will be a minimum of 30 mils thick.

**6. Page 4-2, Section 4.4, Site 10 Debris Removal;
Whole Section.**

Page 1-1 notes that there is approximately 1850 cubic yards of solid waste at this site. Please state if this is the upper limit of removal or that if there is in actuality more than this amount of debris that it will be removed.

**7. Page 4-2, Section 4.4, Site 10 Debris Removal;
Paragraph 6, Sentence 4.**

This sentence states that there will be no backfilling once the waste is excavated from the site. Please estimate how deep the hole will be that will be left in the ground and if this will present a safety hazard.

**8. Page 4-3, Section 4.6, Calf Pasture Point;
Paragraph 6, Sentence 1.**

This sentence states that the doors to the bunkers will be welded shut upon approval of the work by the Navy. Regulator concurrence that the cleanup is complete should be sought prior to welding the doors shut.

**9. Page 4-8, Section 4.8, Lead Contaminated Soil Removal;
3rd Paragraph after the Bullet.**

This paragraph indicates that lead will be cleaned up to a level below 500 ppm. Please note that EPA requires levels below 400 ppm. Therefore the cleanup goal should be 400 ppm.

**10. Page 5-2, Section 5.4.2, Hazardous waste Management;
4th Bullet.**

The container storage areas should have a capacity of the largest container plus 10% in the event that the largest container ruptures during a precipitation event.

11. Table 5-2, Disposal Facilities and Technologies.

For soils passing TCLP lead the use of the Central Landfill in Johnston, RI or the landfill in Plainville, MA should be considered rather than Turnkey, NH to save on transportation costs.

**12. Page 6-2, Section 6.5.1, Field Duplicate Samples;
Paragraph 1, Sentence 3.**

Please define how many samples constitute a "small sampling event" since it is proposed not to have field duplicates for this type of event.

**13. Page 6-3, section 6.6.1, Wipe Sampling;
Paragraph 2 Sentence 4.**

Even though more dust would be expected on the walls and floors, due to brownian motion there could be sufficient dust on the ceiling to exceed standards. This should be ascertained. Therefore a sixth wipe sample should be taken of the ceiling.

14. General Comment.

Please provide the SHERP.