



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203-0001

August 22, 1997

Mr. Philip Otis
U.S. Department of the Navy/Northern Division - NAVFAC
10 Industrial Highway
Code 1811/PO - Mail Stop 82
Lester, PA 19113-2090

Re: Addendum 2 for Work Plan for Site 10 Debris Removal, Building 111 Removal of Lead Dust, Calf Pasture Point Munitions Bunker Lead Clean up, Removal of Lead contaminated Soils, at the former Naval Construction Battalion Center Davisville, Rhode Island, Dated July 25, 1997

Dear Mr. Otis:

Pursuant to § 7.6 of the NCBC Federal Facility Agreement (FFA), the Environmental Protection Agency's (EPA) has reviewed the above referenced document. Our comments are enclosed.

The Navy has not included field screening sampling by X-Ray Florescence in this document. Field sampling may reduce the construction/excavation period. If the Navy decides to use a field screening procedure, please forward the SOP for our review.

If you have any questions with regard to this letter, please contact me at (617) 573-5736.

Sincerely,

A handwritten signature in cursive script, appearing to read "Christine Williams".

Christine A.P. Williams, RPM
Federal Facilities Superfund Section

Enclosure

cc: Christi Davis, Northdiv
Richard Gottlieb, RIDEM
Walter Davis, CSO
Steve DiMattei, EPA
George Horvat, Dynamac
Marilyn Cohen, ToNK
Howard Cohen, RIEDC
Bryan Wolfenden, RI RC&DC, Inc.
Marjory Myers, Naragansett Indian Tribe



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EPA Comments on the Addendum No. 2 to Final Work Plan Site 10 Debris Removal, Building 111 Removal of Lead Dust, Calf Pasture Point Munitions Bunker Lead Cleanup and Removal of Lead Contaminated Soils

GENERAL COMMENTS:

- The areas to be excavated should be more clearly defined in the text and displayed in the figures. Paragraph 2 of Section 1.0 states that the Perimeter Edge values in Table 1-1 indicate the horizontal area around the building to be raked and vacuumed. This statement implies that a Perimeter Edge of 10 feet, for example, would involve the removal of surface soil from a distance of 10 feet from all sides of a building, provided there are no obstructions such as asphalt or another building. However, other areas of the report imply that the intent is to only remove soil in the bare soil areas within the Perimeter Edge. This should be clearly stated in Section 1.0, Work Description, to avoid confusion.
- Although it has been stated that only bare soil areas will be raked and vacuumed, some figures such as Buildings 113, C 143, and W 004 do not show bare soil in the Perimeter Edge-defined areas. The text should be clarified to explain what activities will occur, or will not occur, in these lead-contaminated building areas.
- The initial depth for raking and vacuum removal of soil is 3/4 inch. Based on the results of the confirmatory sampling analyses, further excavation may be required. As a result, site restoration activities such as the replacement of topsoil, seeding, etc., should be discussed and the appropriate work plan section referenced.
- This addendum does not address the vertical extent of the lead contamination. If the confirmatory soil sampling indicates that lead contamination is still present, then provisions must be taken to determine the vertical extent of the lead contamination.

SPECIFIC COMMENTS:

Section 2.0, Quality Control. Additional text or a table should be included in this section that indicates the approximate number of samples including the minimum frequency of QC samples such as blanks, duplicates, spikes, LCSs, etc.

Section 5.0, Transportation and Disposal, Page 1, Paragraph 1. The method by which the wastes will be transferred from the truck to the roll-offs should be explained. Dust suppression and air monitoring procedures used during the transfer of material should be documented. Also, this paragraph should explain the method by which wastes will be attempted to be segregated. For example, whether soil areas of lower lead contamination will be removed first and consolidated in the same roll-off, thereby avoiding the mixing of high and low lead-contaminated soils. Prior to mobilization, the building sequence for soil removal and the proposed combination of contaminated soil (by building location) for each roll-off should be provided to EPA. Records should be maintained of the soils placed in each roll-off by building and area.

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Section 6.1, Confirmatory Soil Sampling, Page 3, Paragraphs 1 and 2. It is proposed that a minimum of one composite sample be collected from the bare soil areas around each building. It is also stated that "Each composite sample will be comprised of five to ten subsamples, or aliquots, taken at a maximum frequency of one per 500 ft², and a minimum frequency of one per 50 feet of building side." As stated, it is not clear if the composite sample, as a whole, will represent a maximum area of 500 ft² and a minimum of one per 50 feet of building side, or if these values apply to each of the subsamples or aliquots. Further clarification is required.

Section 6.1, Confirmatory Soil Sampling, Page 3, Paragraph 3. It is stated, "If a composite sample fails to meet the cleanup criterion of 500 ppm total lead, then discrete samples will be collected adjacent to the locations of the previously collected aliquots prior to any additional excavation." The sampling procedure, in the event that the discrete samples fail to meet the cleanup criteria, should be discussed. Additionally indicate the next step the Navy will take to remediate the problem if any samples then fail the cleanup level such as: soil excavation to what depth or covering and deed notifications.

Section 6.2, Waste Characterization Sampling, Page 3, Paragraph 1. The Navy proposes to prepare a composite sample from the roll-off containers by collecting aliquots from each of the four corners of the roll-off at a depth of 1 foot. Depending upon how the soil is placed in the roll-off, the soil at the depth of 1 foot may represent a single building area which would not be representative of the mix of soil in the container. Therefore, it is recommended that the aliquots be collected at various depths and in a manner which will represent the soil mixture.

Section 7.0, Reporting, Page 3, Paragraph 1. The method by which the "exact field locations" of the collected aliquots or discrete samples will be determined should be explained.