



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

June 27, 1996

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: Draft Work Plan for Site 13 at the former Naval Construction Battalion Center Davisville, Rhode Island, Dated June 5, 1996

Dear Mr. Otis:

Pursuant to § 12.5 of the NCBC Federal Facility Agreement (FFA), the Environmental Protection Agency's (EPA) has reviewed the above referenced document.

The Navy has not included field screening sampling by field GC or by immunoassay field testing 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.

The current sampling plan is based on the confirmatory sampling requirements for a PCB spill. However, it was agreed that the field sampling plan would include sampling to determine if the human and ecological receptor exposure to contaminated surface soils is reduced by this removal action. A representative number of confirmatory PCB sample locations and the pesticide and metals sample locations should be located in the bio-available depth of 0-1 foot to determine the exposure to ecological receptors. The human health risk reduction from exposure to PCBs and metals in surface soils should be determined from a representative number of samples in the 0-2 foot range.

The Navy must ensure this proposed removal action will adequately mitigate or eliminate the threats posed by the site and will be conducted in a manner consistent with CERCLA and the National Contingency Plan. Should the Navy, in consultation with EPA and RIDEM, determine that additional remedial action is required at Site 13, the Navy must transition from removal to remedial response activities.

EPA requests that the Navy respond to the attached comments IAW § 12.5 of the FFA and a final work plan be forwarded for our files. The Navy is reminded that a copy of the public notice tear sheet for this site should be forwarded for our files.

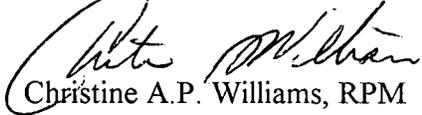
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If you have any questions with regard to this letter, please contact me at (617) 573-5736.

Sincerely,



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

Enclosure

cc: Christi Davis, Northdiv
Rich Gottlieb, RIDEM
Walter Davis, CSO
Tim Prior, USF&WL
Steve Dimaattei, EPA
Jayne Michaud, EPA

GENERAL COMMENTS

1. Since the horizontal and vertical extent of the contamination at the site have not been determined, the Navy should include the field sampling plan for the determination of excavation boundaries. It has been mentioned by Foster Wheeler Employees, that the Navy plans on using immunoassay field sampling kits during excavation to determine the extent of excavation. Please forward the sampling plan and QA/QC plan for our review.
2. The Navy should indicate what the Target Cleanup Levels (TCLs) for the analytes of interest. The Navy should also indicate the reason for the SVOCs, Pesticides, and Metals listed during Waste Characterization Sampling and Confirmatory Sampling and indicate when and how will they be addressed.
3. The references to the "Project Specifications" must include the which of the two documents is actually being referenced and the applicable section within that document.
4. The Site Health and Safety Officer and the off-site laboratory have yet to be determined. Both should be identified and a copy of the off-site laboratorys QAPjP be included in the revised work plan for Site 13, as was done for the EBS Work Plan.

SPECIFIC COMMENTS

5. Page 1-1, Section 1.1, **Project Description**

The text in this section should reference the documents that include the vertical and horizontal delineation of the contamination and the contaminants of concern for Site 13 (see also GENERAL COMMENTS). The text should indicated the DQOs for Site 13 sampling.

6. Page 2-1, Section 2.1, **Project Organization**

The text does not provide descriptions of the duties for all of the individuals listed on the organizational chart in Figure 2-1. Also, the text does not indicate who will be responsible for coordinating with RIDEM and EPA personnel, please indicate if it will be the Navy BEC.

It is not clear how Foster Wheeler will coordinate between the on-site and home office personnel. Is there backup for the part-time personnel? Are there provisions for on-site personnel to make time critical decisions when home base personnel are unavailable? Please clarify.

7. Page 3-1, Section 3.1, **Regulatory Drivers**

This is a site specific work plan and must include the specific regulations or policy for the cleanup levels or goals established for Site 13 (i.e. excavation of all PCB contaminated soil >10 ppm).

8. Page 3-2, Section 3.2, Clean Fill Import

The text states that the Project Specifications require testing of fill material. Please reference the document and the section referred to in the text, along with the acceptance criteria the Navy will use to determine the acceptability of the fill.

9. Page 3-2, Section 3.2, Groundwater Well Abandonment

The text should state that The Rhode Island Rules and Regulations for Groundwater Quality will be used as a guidance when abandoning groundwater wells.

10. Page 4-4, Section 4.3, Testing and Sampling Methodology

Chemical Testing and Sampling

Include the frequency and testing of the SVOC, pesticide and metals sampling in this text, on table 4-1 and table 7-1.

Geotechnical Testing and Sampling

This is a site specific work plan. The laboratory should be listed in the work plan and a copy of their laboratory Quality Assurance Plan included as an appendix to the work plan. Prior approval of the independent testing laboratory ensures that useable data will be generated and the Site 13 DQOs will be able to be met.

11. Page 4-6, Section 4.3, Equipment Calibration

The text indicates that the equipment calibration frequency will be described in the qualification statement of the laboratory. The qualification statement of the laboratory must be included in this site specific Work Plan.

12. Page 4-11, Section 4.6, **Corrective Action Program**

Indicate when and how the Navy will inform RIDEM and EPA personnel of any corrective actions regarding Site 13.

13. Page 4-12, Section 4.7, Quality Overview of Site Activities

Will copies of the written checklists provided to RIDEM and EPA

personnel(also see comment #8 above)?

14. Page 5-4, Heavy Equipment Decontamination & Hand Held...

The specific document and section of the Project Specifications, or the actual SOPs for decontamination must be referenced.

15. Page 5-4, Section 5.3, Inspection and Cleaning of Storm...

Provisions should be included in this Work Plan for the removal of collapsed piping, especially if it is determined that the sediment contained within the piping is contaminated. Provisions should also be included, such as engineering controls, to insure that no contamination is washed past the nearest catch basin.

16. Page 5-5, Section 5.4, Catch Basin Cleanout

The text should include what measures will be taken if initial characterization shows contamination of the waste streams and sediment.

17. Page 5-5, Section 5.6, Excavation of Contaminated Soil

The text should reference the actual documents that contain the data used to determine the extent of the PCB contamination for Site 13. If other useable data was generated, but is not be utilized, then a statement why this data is not being considered should also be included in the text.

An additional bullet should be added to explain the field sampling to determine actual extent of excavation. The text should also indicate that the final limits of the excavation should be based on the field sampling results (with laboratory confirmation) of two consecutive grid sample locations that are below the clean up level. (See also letter dated April 15, 1996 from EPA, Christine Williams, to Phil Otis)

18. Page 5-8, Section 5.6, Last bullet point

The last bullet should include a reference to Section 7.3.2 (Confirmatory Sampling) of this Work Plan.

19. Page 7-1, Section 7.2, QA/QC

The laboratory Quality Assurance Plan (QAP) must include a reference to "Sampling and Chemical Analysis Quality Assurance Requirements for the Navy Installation and Restoration Program, NEESA 20.2-047B" revised June 1988. The QAP must be included in this site specific Work Plan to ensure appropriate QA/QC will be implemented throughout the sampling and analysis programs for Site 13.

20. Page 7-5, Confirmatory Sampling

The text should indicate that the sidewall sampling will also have a representative amount of samples at a depth of 0-1 foot deep for PCB, Pesticide and metals analysis for use in the ecological risk assessment of the risks at this site.

21. Page 7-5, Section 7.3.3, Fill Material Sampling

The acceptance criteria for the fill material must be listed or referenced in the text.

22. Page 7-6, Sampling Collection and Analysis

The text should also have a discussion of the SVOC, pesticide and metal analysis SOP.

23. Page 8-1, Section 8.1, Topsoil

Please clarify (i.e. What chemical will be used?) how the topsoil pH will be amended to obtain a pH of 5.5 to 7.