



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

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

9 July 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 Work Plan for Site 13
At Naval Construction Battalion Center (NCBC)
Davisville, Rhode Island
Submitted 6 June 1996, Dated 5 June 1996

Dear Mr. Otis;

The Rhode Island Department of Environmental Management (RIDEM) Division of Site Remediation has reviewed the above referenced document and 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

c: W. Angell, DEM DSR
C. Williams, EPA Region 1
C. Davis, US Navy

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Comments For:

**Draft Work Plan For Site 13
At Naval Construction Battalion Center (NCBC)
Davisville, Rhode Island**

Dated 5 June 1996

1. Figure 5-2, Site Zones Map Site 13.

The catch basin work area should have a contamination reduction corridor (CRC).

**2. Page 5-4, Section 5.4, Catch Basin Cleanout;
Paragraph 1, Sentence 2.**

A vacuum truck will then be used to clean out the sediment for immediate off-site disposal.

Please state if the sediment will be characterized to determine if it is a hazardous waste prior to immediate disposal.

**3. Page 5-5, Section 5.6, Excavation of Contaminated Soil;
Paragraph 1, Bullet 1.**

This bullet notes that the contractor, prior to excavation, will scan the area with electromagnetic and sonic equipment to determine where underground utilities may be located. It is suggested that Dig Safe and the Rhode Island Economic Development Corporation (formerly RIPA) also be contacted for this purpose.

**4. Page 7-1, Section 7.1, Objective;
Last Paragraph, Last Sentence.**

It is assumed that the limits of PCB contamination have been adequately defined prior to excavation, therefore a field screening will not be required.

Please note that the limits of excavation have not been determined, therefore a field screening will be required prior to excavation. It is possible, however, to screen during excavation but this could result in large volumes of excavated material if the contamination is widespread.

**5. Page 7-3, Section 7.3, Sampling Programs;
Paragraph 1, Last Sentence.**

This sentence refers to Table 7-1 which states the number of samples to be taken in the field. Please note that since the area of contamination has not yet been delineated the

number of samples may not be adequate to determine if cleanup has been achieved.

**6. Page 7-3, Section 7.3.1, Initial Waste Characterization;
Bullet 1.**

This bullet notes that catch basin liquids and sediments will be sampled for TPH. Table 7-1 notes that TPH will be measured by 8015 modified. Please state what the modification to method 8015 is and also note that this method is not acceptable if heavy petroleum products, such as no. 4 and 5 oils or highly weathered gas and diesel, are encountered. Given the age and use of the site weathered petroleum products would be more likely than not. Method 418.1 would then be the required procedure.

**7. Page 7-5, Section 7.3.2, Confirmatory Sampling;
Bullet 2.**

This bullet notes that sidewall sampling will be a composite of four sub-samples. Please note that 1: this will dilute the highest concentration of PCBs which could mask out an exceedence and 2: if there is an exceedence of the standard in the composite sample up to four times as much excavation will be required to remediate the site. Therefore compositing of confirmatory samples is unacceptable and discrete samples are required.

**8. Page 7-5, Section 7.3.3, Fill Material Sampling;
Paragraph 1, sentence 2.**

This sentence notes the constituents that the fill material will be tested for. In addition to those listed, PCBs and pesticides should also be included.