



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-831-5508

8 February 2002

Mr. Ed Boyle, Remedial Project Manager
US Department of the Navy
Engineering Field Activity Northeast
Naval Facilities Engineering Command
10 Industrial Highway
Lester, PA 19113-2090

RE: Navy Response to RIDEM 1 February 2002 Comments
Work Plan Addendum #2
Subsurface Investigation at Building 41
IR Program Site 16
(Former Creosote Dip Tank and Fire Fighting Training Area)
Naval Construction Battalion Center
Davisville, Rhode Island
Submitted 7 February 2002, Dated February 2002

Dear Mr. Boyle,

The Rhode Island Department of Environmental Management, Office of Waste Management (RIDEM) has reviewed the above referenced document and has the following comments to offer:

1. **RIDEM Comment 1** - Page 3 of 12, Section 4, Field Procedures, Bullet 2 – It is noted that clearances will be obtained from NCBC Davisville at telephone # (401) 294-6108. This number is no longer in existence. Please correct.

Navy Response – This will be deleted.

RIDEM Comment – The response implies that the Navy Caretaker Site Office will not be informed (i.e. Dave Barney). Please state whether he will be informed or not.

2. **RIDEM Comment 5** - General Comment: As noted above, this work plan is primarily measuring volatiles and cosmolene is mostly comprised of semi-volatiles. The borings need to be sampled for TPH utilizing a GC extractable method. For

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boring locations A and B the boring should be taken in the middle of the former tank location, not down gradient of the former tank location. Two samples for TPH should be taken. In the absence of field evidence the first sample should be taken at a minimum of two feet below the former tank bottom elevation (to avoid sampling clean fill from the tank removal) and the second a few inches above the water table. TPH need not be sampled for at boring location C.

Navy Response - Soil borings SB16-A and SB16-B will be drilled through the related backfilled tank removal locations.

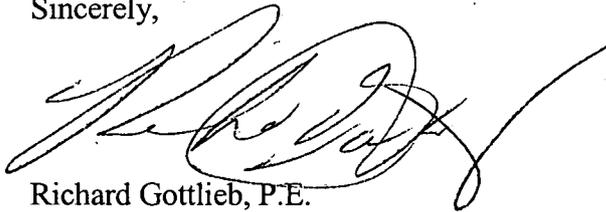
Because Cosmolene is a grease-like material, it is planned to analyze such soil samples for oil and grease by Method 9071B, not TPH.

The soil samples for analysis of oil and grease would be collected from: 1) the 2-ft interval just below the base of the former pit or tank excavation and 2) the interval just above the apparent water table.

RIDEM Comment – Method 9071B is a proposed Method and therefor not yet accepted. Method 9071A is the appropriate Method to use in this situation for oil and grease.

RIDEM looks forward to working with the Navy and USEPA on the completion of studies at this site. If you have any questions or require additional information please call me at (401) 222-2797 ext. 7138 or e-mail me at rgottlie@dem.state.ri.us.

Sincerely,



Richard Gottlieb, P.E.
Principal Engineer

Cc: M. DeStefano, DEM OWM
C. Williams, EPA Region 1
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