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LETTER TRANSMITTING REGULATORY REVIEW COMMENTS ON DRAFT TIER 2  
SAMPLING AND ANALYSIS PLAN DEFENSE HIGHWAY PIPELINE CHAMBER  
INVESTIGATION NS NEWPORT RI  
3/8/2013  
RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT



RHODE ISLAND  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

8 March 2013

James M. Tarr, CPG, CG  
Remedial Project Manager  
NAVFAC MIDLANT, Code OPT3-5  
9742 Maryland Avenue, Bldg Z-144  
Norfolk, VA 23511-3095

RE Draft Tier II Sampling and Analysis Plan, Defense Highway Pipeline Chamber Investigation  
Naval Station Newport, Rhode Island

Dear Mr. Tarr,

The Office of Waste Management at the Rhode Island Department of Environmental Management (RIDEM) has reviewed the *Draft Tier II Sampling and Analysis Plan, Defense Highway Pipeline Chamber Investigation* dated January 2013 for the Naval Station Newport, RI. As a result of this review, this Office has generated the attached written comments on the *Draft Tier II Sampling and Analysis Plan, Defense Highway Pipeline Chamber Investigation*.

This Office looks forward to working with the Navy in the remediation and final close out of this Site. If the Navy has any questions or requires additional information please call me at (401) 222-2797 ext.7148.

Sincerely,

Gary Jablonski, Principal Engineer  
Office of Waste Management

cc Matthew DeStefano, RIDEM  
Richard Gottlieb, RIDEM  
Darlene Ward, NETC, Newport, RI  
Mark Kauffman, PE, Resolution

**RIDEM's Comments on the**  
*Draft Tier II Sampling and Analysis Plan, Defense Highway Pipeline Chamber*  
**Investigation, Naval Station Newport**

**Specific Comments:**

**1. Page 10, SAP Worksheet # 6: Communications Pathways; Field Progress Reports.**

Please add the following text to this section of the report: *“The Resolution PM will provide RIDEM and the Navy with a one week notice before field activities are initiated and a 48 hour notice prior to the completion of the field activities. Once field activities are initiated, Resolution will provide a weekly construction update. Updates will be provided via electronic mail. At a minimum, these weekly construction updates will provide the following: 1) Summary of work completed the previous week; 2) Summary of work planned for current week; 3) Sampling results; 4) Discussions of major construction issues and resolutions; and 5) Proposed amendments to this` SAP.”*

**2. Page 21 and 24, SAP Worksheet # 10: Conceptual Site Model, Defense Highway Pipeline Chambers: Current Site Use and Previous Site Investigation Activities 1<sup>st</sup> sentence.**

*“In 2000, Tetra Tech was contracted to perform in-place cleaning and in-place abandonment of a 6-mile span of pipeline located at NAVSTA Newport. The former pipeline and chambers are currently abandoned in place and not in use”*

Please be advised that while reviewing the historical data and observing other field activities performed at the site it appears that only one fuel line (12-inch line from North Booster House to Chamber C-18 and then this line changed to a 16-inch fuel line at C-18 to CT-53) was pigged and cleaned. On historical drawings *“Fuel Distribution System Area I Site Plan”* dated 11 June 1954 and *“Master Shore Station Development Plan Part IV Section 6 Area Development Plan Gas and Fuel Oil”* dated 20 April 1954 shows the following: a 12-inch Diesel line from Chamber A-6 located at Tank Farm 3 north to Chamber C-18; 14-inch Jet Fuel and 12-inch Aviation Gas lines from the Stripper Pit at Tank Farm 3 north to the valve and vent pit located west of Tank Farm 2; and 14-inch Jet Fuel, 12-inch Aviation Gas, 4-inch Aviation Gas Stripper , and 4-inch Jet Fuel Stripper lines from the valve and vent pit located west of Tank Farm 2 north to the Aviation Gas and Jet Fuel Booster House located in the Back Yard Area. These additional fuel lines and any associated chambers would need to be pigged, cleaned, and properly investigated. Also, in order for the Navy to properly close out these fuel lines in accordance to RIDEM UST Regulations, the Navy would need to perform laboratory testing on soil samples below and along the entire length of these fuel lines.

**RIDEM's Comments on the**  
*Draft Tier II Sampling and Analysis Plan, Defense Highway Pipeline Chamber*  
**Investigation, Naval Station Newport**

**3. Page 42, SAP Worksheet #11; Goal 3.**

Please add additional language to the text on how these temporary monitoring wells will be installed, and what type of material will be used for the fill around the well screens. It would seem prudent to use the largest material possible around the well screens in order to allow for the heavy petroleum to enter in to the well.

**4. Page 61, SAP Worksheet #17; Confirmatory Soil Sampling; whole section.**

Please be advised that RIDEM does not accept composite sampling for TPH confirmatory soil samples. The confirmatory soil samples must be collected as discrete samples. It was not clear to this reviewer whether the confirmatory soil samples would be discrete or composite samples. Please add language to the text that states that the soil samples will be discrete soil samples.

**5. Page 67, SAP Worksheet #14; Investigation-Derived Waste Management.**

Any IDW generated at the site must be handled in accordance to the RIDEM's *Policy Memo 95-01 Guidelines for the Management of Investigation Derived Wastes*.