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LETTER TRANSMITTING U S NAVY RESPONSES TO REGULATORY COMMENTS ON  
DRAFT TIER 2 SAMPLING AND ANALYSIS PLAN DEFENSE HIGHWAY PIPELINE  
CHAMBER INVESTIGATION NS NEWPORT RI  
3/26/2013  
RESOLUTION CONSULTANTS

March 26, 2013

Mr. Gary Jablonski  
Principal Engineer  
Rhode Island Department of Environmental Management  
235 Promenade Street  
Providence, RI 02908-5767

**RE: Response to Comment Letter Dated 3/8/2013  
Draft Tier II Sampling and Analysis Plan, Defense Highway Pipeline  
Chamber Investigation  
NAVFAC Atlantic Navy CLEAN Program  
Contract No. N62470-11-8013  
Contract Task Order (CTO) WE29  
Pipeline Chamber Investigation  
NAVSTA Newport, Newport, RI**

Dear Mr. Jablonski:

On behalf of the United States Navy, Resolution Consultants (Resolution) has prepared the following responses to comments received on March 8, 2013 to the Draft Tier II Sampling and Analysis Plan for the Defense Highway Pipeline Chamber Investigation, at NAVSTA Newport, RI, dated January 2013. If these changes are acceptable, please contact James Tarr, Navy RPM Manager, at (757) 341-2009 or Naomi Ouellette, Task Order Manager, at (401) 274-5685 x16 to indicate your approval of the finalization of the Sampling and Analysis Plan (SAP).

**Specific Comments:**

**1: Page 10, SAP Worksheet #6: Communication 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 the work completed the previous week; 2) Summary of the work planned for current week; 3) Sampling results; 4) Discussions of major construction issues and resolutions; and 5) Proposed amendments to the SAP."

*Response: This language and the RIDEM Case Manager's contact information have been added to Worksheet #6 under Field Progress Reports.*

**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 vet 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.

*Response: The Navy does not have information indicating the potential presence of site impacts beyond the areas included in the draft SAP. Per the Navy's correspondence with RIDEM on March 13, 2013, the Navy would prefer to proceed with the planned investigation of the areas included in the draft SAP, while RIDEM assists the Navy in providing any additional details on potential additional site impacts that RIDEM would like the Navy to consider. The language of the SAP will be revised to state the following (revised language underlined):*

*"In 2000, Tetra Tech was contracted to perform in-place cleaning and in-place abandonment of a 6-mile span of main fuel supply pipeline located at NAVSTA Newport. The former main fuel supply pipeline and chambers are currently abandoned in place and not in use. RIDEM and the Navy are currently evaluating whether additional site impacts remain that require additional investigation prior to closure."*

**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.

*Response: Agreed. The language describing the well installation on pages 42, 45 and 63 will be revised as follows (revised language underlined):*

*Worksheet #11, Page 42:*

*"A temporary monitoring well will be installed in the test pit located on the downgradient side of chambers A16, E22, and E16. A groundwater sample will be collected from the temporary well for analysis of TPH. Refer to Worksheet #17 for a description of the well installation."*

*Worksheet #11, Page 45:*

*"Grab groundwater samples will be collected from temporary monitoring wells installed in the test pit advanced on the downgradient (presumed west) side of three chambers (A16, E16 and E22). These chambers indicated the highest TPH impacts during previous investigations. Groundwater will be collected via peristaltic pump from the monitoring wells. The groundwater sampling locations were selected to assess potential contaminants in the shallow aquifer underlying the site due to historical operations. Further details on the groundwater sampling are provided in Worksheet #17."*

*Worksheet #17, Page 63:*

*"To support Goal 3, a temporary well will be installed during the backfilling of the test pit advanced on the downgradient side of chambers A16, E16 and E22. To the extent practicable, each test pit will be advanced at least 5 feet into the groundwater table in the area of the proposed well. A 2-inch diameter PVC well with an appropriate length of screen will be placed into the test pit at depth. The test pit will be backfilled with excavated material; however, the area immediately surrounding the well materials will be surrounded with peastone and/or an appropriately graded sand in order to aid in well development and to prevent fine sediments from entering the well screen. In addition, as previously stated, some chambers may be partly located under Defense Highway and may be inaccessible for test pitting. Geoprobe soil borings may be required to investigate these chambers. In the event that a Geoprobe will be accessing the site, Resolution reserves the right to consider installing these temporary wells using a Geoprobe."*

**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.

*Response: Agreed. The following sections will be revised as follows to clarify that all samples will be discrete samples and that no samples will be composited relative to TPH sampling (revised language underlined):*

*Worksheet #11, Page 45:*

*"There are up to 48 discrete soil sampling locations from test pits and 4 grab soil sample locations from outfall discharge points as part of this SAP. Soil samples will be screened at regular intervals from approximately 1 to 12 feet BSG in the test pits and at a depth of 1 ½ feet at the outfall points. Each soil sample will be screened in the field using a PetroFLAG screening kit and a PID. If a soil sample exhibits a reading of 400 ppm or greater with the PetroFLAG or 100 ppm or greater with the PID calibrated with isobutylene, that sample will be retained for potential submittal for laboratory confirmatory analysis. No samples will be composited."*

*Worksheet #17, Page 61:*

*"To support Goal 1, one discrete soil sample will be collected from each test pit (48 total). Target depths/rationale are shown on Table 11-1; however, the precise depths may be modified based on actual field conditions (i.e., field parameters, visual evidence of impacts, depth to groundwater, depth to bottom of the chamber, etc.). Soil samples will be collected as discrete samples and no compositing is proposed."*

*Worksheet #17, Page 61:*

*"To support Goal 1, one discrete soil sample will be collected from each test pit (48 total)."*

**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*.

*Response: Agreed. Reference to the IDW Guidelines has been added to the SAP.*

Sincerely yours



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Naomi Ouellette, Resolution Consultants

cc:

Mark Kauffman, Resolution Consultants  
James Tarr, US NAVY  
Darlene Ward, NAVSTA Newport