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RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT COMMENTS ON  
THE DRAFT SAMPLING AND ANALYSIS PLAN FOR FORMER BUILDING 70 NS NEWPORT  
RI  
10/16/2014  
RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT



RHODE ISLAND  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

16 October 2014

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 Sampling and Analysis Plan (SAP), Former Building 70  
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 SAP, Former Building 70* dated 19 August 2014 for the Naval Station Newport located in Middletown, RI. As a result of this review, this Office has generated the attached written comments on this Draft SAP.

This Office looks forward to working with the Navy in the final remediation and final close out of this Site in the near future. If the Navy has any questions or requires additional information in regards to this letter please contact me at (401) 222-2797 ext.7148 or email at [gary.jablonski@dem.ri.gov](mailto:gary.jablonski@dem.ri.gov).

Sincerely,

Gary Jablonski, Principal Engineer  
Office of Waste Management

cc Matthew DeStefano, RIDEM  
Lisa Primiano, RIDEM  
Robert Krivinkas, NETC, Newport, RI  
Naomi Ouellette, Resolution Consultants

**RIDEM's Comments on the  
Draft SAP  
Former Building 70, NETC**

**General Comments:**

1. As you are aware, in accordance to RIDEM's Remediation Regulations Sections 8.01E on page 37 and 8.07A page 65, "*The presence of NAPL in any environmental medium shall be considered a condition that exceeds Upper Concentration Limits*". As stated in the Test Pit Investigation Summary email to James Tarr and Gary Jablonski from Shaw Group dated 14 November 2011, "*A small discharge of free product and sheen was noticed in the northwest corner of the 20 x 20 excavation during the test pitting activities. This area was further excavated revealing a lens of free product seeping through the sidewall from 8 feet to 12 feet bgs.*" This area was also recommended by Shaw Group for "*further excavation and delineation is warranted by the Navy*" in their Final Removal Action Completion Report dated July 2012. Please provide in this work plan the necessary investigations and remove any and all contaminated soils and media containing free product from the Site.

**Specific Comments:**

2. **Page I, Executive Summary; entire Section.**

As stated in this Office's Remedial Approval Letter (RAL) for this Site dated 14 July 2005, that is mentioned in this section, "*The removal action includes removal of contaminated soils and free product at the former Midway Pump House Complex. After compliance soil samples have been obtained and analyzed to confirm concentrations are below the Residential Exposure Criteria (REC), excavations are to be backfilled with clean soil.*". In accordance to Shaw's Final Removal Action Completion Report dated July 2012, there is still free product and exceedances of RIDEM's Residential Exposure Criteria remaining at the Site. Therefore this proposal to install the new groundwater wells to determine if additional actions are recommended and if site closure can be achieved is premature since Shaw stated that free product and exceedances of REC are still present at the Site. Please provide a section in this plan to fully investigate and remove the free product and soil exceedances of the REC still present at this Site.

3. **Page WS 10-4, Previous Site Investigation Activities; 1st paragraph, 2nd sentence.**

*"Based on these results, it was recommended that further investigations be conducted."*

Please add the following underlined text to the above sentence that was stated in Shaw's Report: "...*that further investigations and excavation be...*"

4. **Page WS 10-4, Previous Site Investigation Activities; 1st paragraph, last sentence.**

**RIDEM's Comments on the  
Draft SAP  
Former Building 70, NETC**

It appears to this reviewer that the 4-inch pipe was located in the northeast side of the Shaw excavation near Test Pit 2 during field activities. Please update Figure 3 to show 2011 excavation and location of 4-inch pipe from Chamber A16 correctly on figure.

**5. Page WS 10-4, Previous Site Investigation Activities; 3rd paragraph, 3rd sentence.**

*"During the 2013 investigation, LNAPL was observed seeping from the concrete vault surrounding the pipeline in the vicinity of chambers E22 and A16."*

It would seem prudent since chambers E22 and A16 are upgradient and the 4-inch product line is from Chamber A16 that the Navy would fully delineate and remove the free product stated in the sentence above. Please add language to this SAP to investigate the extent and remove all free product that might be impacting this Site.

**6. Page WS 10-4, Nature and Extent of Contamination; whole section.**

Please add language to this section that documents that free product still remains on site.

**7. Page WS 11-1, Step 1- Problem Statement; 1st paragraph.**

Please refer to Specific Comment 6 listed above.

**8. Page WS 11-1, Step 1- Problem Statement; 2nd paragraph.**

Please be advised that during Shaw's test pitting activities in 2011, monitoring well PW-3 was removed in order to remove the free product found around this well. This well did not show any signs of free product in the well but still during test pit activities the free product was observed. It would seem prudent to continue with test pitting investigations until all free product has been fully delineated and removed from the Site. Please add language to this SAP to perform test pitting activities.

**9. Page WS11-1, Step 2-Study Goals; whole section.**

Please refer to General Comment 1, Specific Comments 2, 5, 6, and 8 listed above.

**10. Page WS 11-2, Step 3-Information Inputs; whole section.**

Please refer to Specific Comment 8 listed above.

**11. Page WS 11-2, Spatial Boundaries; whole section.**

**RIDEM's Comments on the  
Draft SAP  
Former Building 70, NETC**

Please refer to Specific Comment 8 listed above.

**12. Page WS 11-3, Step 5-Analytical Approach; whole section.**

Please refer to Specific Comment 8 listed above.

**13. Page WS 17-2, Soil Sampling; Inputs; whole section.**

Please refer to Specific Comment 8 listed above.

**14. Page WS 17-1, Soil Sample Collection; whole section.**

Please check page numbers and fix if necessary. Also, please add the GRO and DRO range will be from C6 to C44.