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C-52-2-5-2243W

Project Number 1679

April 4, 1995

Mr. Paul Kulpa
Rhode Island Department of Environmental Management
Division of Site Remediation
291 Promenade Street
Providence, Rhode Island 02908

Reference: CLEAN Contract No. N62472-90-D-1298, Contract Task Order 172

Subject: Response to RIDEM's Comments Regarding the HNUS Melville North Landfill RI/FS
Work Plan

Dear Mr. Helland:

Enclosed please find the HNUS and Navy responses to the above referenced RIDEM comment letter. These responses are submitted in advance on behalf of the Navy to facilitate the concurrence of investigative approach between RIDEM and the Navy. The Navy hopes to resolve these issues during the schedule conference call between RIDEM, Navy, and HNUS on April 7, 1995 at 10:30 AM. We look forward to an amicable resolution of these issues so that we may achieve the mutual goal of site remediation in a timely manner.

If you have any questions regarding this matter, please contact me at (508) 658-7899.

Sincerely,

A handwritten signature in black ink, appearing to read "K. Scully", is written over a horizontal line.

Kevin J. Scully, L.S.P.
Project Manager

KJS:gmd

Enclosures

c: D. Carlson, Navy w/enc.
R. Gottlieb, RIDEM w/enc.
B. Wheeler, Navy-NETC w/enc.
M. Turco, HNUS w/o enc.
G. Bullard, HNUS w/o enc.
File 1679-3.2 w/o enc./5086-2.1 w/enc.

**NAVY RESPONSE TO
RIDEM WORKPLAN COMMENTS DATED 2/26/95**

RIDEM GENERAL COMMENT # 1 - Investigate Referenced Waste Pits

HNUS RESPONSE: HNUS has not been able to locate the waste pits identified and referenced by RIDEM. RIDEM's assistance in location identification is requested.

RIDEM GENERAL COMMENT # 2 - Perform TPH Sampling using Method 418.1

HNUS RESPONSE: Given the ambitious soil sampling program currently planned by the Navy, HNUS is concerned that any additional volumetric sampling requirements will increase the likelihood of experiencing substantial data gaps. HNUS therefore recommends that TPH be analyzed using Method 8015(b) in place of Method 418.1 analysis. The major advantage of the Method 8015(b) analysis is that it can be performed using the same extract used for Method 8270 analysis, therefore no additional volumetric requirements will be necessary. In addition to providing a TPH concentration, Method 8015(b) has the additional advantage of providing a "fingerprint" identification of the TPH encountered in the soil samples.

RIDEM COMMENT # 3 - Identify Referenced Features On Work Plan Figures

HNUS RESPONSE: HNUS has not been able to locate the waste pits or all the areas of ponded water identified and referenced by RIDEM. RIDEM's assistance in location identification is requested.

RIDEM COMMENT # 4 - Headspace Monitoring

HNUS RESPONSE: HNUS will incorporate the headspace monitoring procedure recommended by RIDEM in the work plan.

RIDEM COMMENT # 5 - Decrease Surface Soil Sampling and Increase Subsurface Soil Sampling

HNUS RESPONSE: HNUS recommends against this modification. Exposure to surface soil is one of the most critical pathways evaluated during a Risk Assessment. Given that the Melville North Landfill is not covered with a RCRA approved cap, the importance of adequately evaluating this potential exposure pathway remains.

RIDEM COMMENT # 6 - RIDEM Soil Sampling Modification Request

HNUS RESPONSE: HNUS will incorporate the modified soil sampling procedure recommended by RIDEM in the work plan.

RIDEM COMMENT # 7 - Data Gaps - Test Pits

HNUS RESPONSE: HNUS will perform the RIDEM requested test pitting in the vicinity of Boring Location B-12. Test pits will be field screened (with an FID or PID) and logged. Test pit data will be used in determining soil boring and monitoring well installation locations in this area.

RIDEM COMMENT # 8 - Data Gaps - Additional Monitoring Well Installation

HNUS RESPONSE: HNUS will add the language requested by RIDEM to indicate that monitoring wells will be installed in planned soil boring locations should floating product or considerable soil contamination be encountered.

RIDEM COMMENT # 9 - Data Gaps - Soil Sampling Location Modification

HNUS RESPONSE: HNUS will modify the sampling locations of the referenced samples as requested by RIDEM.

RIDEM COMMENT # 10 - Data Gaps - Leachate Outbreak and Wetlands Sampling

HNUS RESPONSE: No leachate outbreaks or visible staining or contamination were observed during the initial ecological walkover conducted during the Fall of 1994, however HNUS will collect the requested samples should any visible contamination or leachate outbreaks be discovered during the Supplemental Ecological Walkover to be conducted during the Spring of 1995.

RIDEM COMMENT # 11 - Data Gaps - Sediment Sampling

HNUS RESPONSE: No leachate outbreaks or visible staining or contamination were observed during the sediment sampling conducted during the initial ecological walkover conducted during the Fall of 1994, however HNUS will collect the requested samples should any visible contamination or leachate outbreaks be discovered during the Supplemental Ecological Walkover to be conducted during the Spring of 1995.

RIDEM COMMENT # 12 - Data Gaps - Soil Boring Location Modification

HNUS RESPONSE: HNUS will modify the boring locations of the referenced samples as requested by RIDEM if RIDEM assertion is verified by field observations.

RIDEM COMMENT # 13 - Data Gaps - RIDEM Review Of Referenced Monitoring Well Installation Locations

HNUS RESPONSE: Acknowledged.

RIDEM COMMENT # 14 - Data Gaps - Monitoring Well Location Modification

HNUS RESPONSE: HNUS will modify the well installation locations of the referenced wells (assumed to be MW-9 and the replacement promised for MW-3) as requested by RIDEM.

RIDEM COMMENT # 15 - Bedrock Coring

HNUS RESPONSE: HNUS will core the bedrock until competent rock is encountered. The annular space in the competent bedrock will then be backfilled with bentonite and the well screen will be placed in the fractured and/or weathered bedrock above the competent rock.

RIDEM COMMENT # 16 - Groundwater Sampling Methodology

HNUS RESPONSE: HNUS believes that the low-flow sampling methodology currently specified in the Melville N. RI/FS work plan represents the best available technology for collecting representative groundwater samples. This sampling methodology has been successfully employed by the Navy at CBC Davisville. HNUS therefore recommends that the low-flow sampling approach for this site be retained.

RIDEM COMMENT # 17 - Monitoring Well Construction Methodology

HNUS RESPONSE: HNUS will modify the monitoring well construction methodology as requested by RIDEM.

RIDEM COMMENT # 18 - Monitoring Well Development Methodology

HNUS RESPONSE: In response to RIDEM's request for additional well development, if required, HNUS will increase the specified upper limit of monitoring well development time to three hours for each well.

RIDEM COMMENT # 19 - Monitoring Site Groundwater for NAPLs

HNUS RESPONSE: As stated during our February meeting, HNUS will monitor each well for the presence of NAPLs with an oil/water interface probe during the well development task. Should no NAPLs be encountered at this time all subsequent water level measurements will be performed with an electric water marker. HNUS will, prior to well purging, use the bailer to collect a sample from the top of the water table and pour this sample into a driller's jar for observation. Any immiscible layers which separate from the water will be noted in the field log book, and, such a layer is discovered, subsequent water level measuring events in the subject well(s) will be made using an oil/water interface probe.

If NAPL's are detected during well development, this separate phase will be sampled within two weeks of discovery.

RIDEM COMMENT # 20 - Data Presentation in RI Report

HNUS RESPONSE: HNUS will modify the presentation of extant of contamination in report figures to include concentrations of contaminants by analytical classification on aerial view maps. These data will also be displayed for the cross section lines chosen to delineate the site.

RIDEM COMMENT # 21 - Site Ecological Evaluation

HNUS RESPONSE: HNUS and the Navy are aware that a complete ecological evaluation of the landfill site must take into account the near shore environmental conditions. It is not necessary, however, to delay the execution of the terrestrial investigation while the issue of the offshore ecological is discussed by the Navy and RIDEM. Both HNUS and the Navy therefore recommend that the terrestrial investigative work outlined by this work plan proceed as scheduled.

RIDEM COMMENT # 22 - Clarification Of UCL Application

HNUS RESPONSE: For the evaluation of the risk associated with site soils, the representative exposure point concentration will be developed by calculating the 95% Upper Confidence Level (UCL) of the mean concentration of each compound evaluated. For site groundwater, the representative exposure point concentrations will consist of both the 95% UCL for the mean concentration and the maximum observed concentration of each compound evaluated.

RIDEM COMMENT # 23 - Future Land Use

HNUS RESPONSE: It is the Navy's position that the currently proposed evaluation for future land use - industrial/commercial is the appropriate conceptual model for this site.

RIDEM COMMENT # 24 - Treatment Study and FS Plan

HNUS RESPONSE: HNUS will modify this section of the work plan as requested by RIDEM.