



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

June 9, 2005

Curt Frye
U.S. Department of the Navy
Naval Facilities Engineering Command
10 Industrial Highway
Code 1823-Mail Stop 82
Lester, PA 19113-2090

RE: Evaluation of Response to Comments on Draft Work Plan Restoration Site 8 Soil Removal Action SA 08, NUSC Disposal Area and Revision 2 Work Plan Restoration Site 8 Soil Removal Action SA 08 NUSC Disposal Area , Naval Station Newport, Newport, Rhode Island

Dear Mr. Frye,

The Rhode Island Department of Environmental Management, Office of Waste Management, has reviewed the Navy's Response to comments on Draft Work Plan Restoration Site 8 Soil Removal Action SA 08, NUSC Disposal Area dated May 16, 2005 and Revision 2 Work Plan Restoration Site 8 Soil Removal Action SA 08 NUSC Disposal Area dated May 24, 2005. Attached are comments generated as a result of this review. In general, the comments on the two aforementioned documents are limited to concerns, which were initially broached in the comment letter on the draft work plan. If the Navy has any questions concerning the above, please contact this Office at (401) 222-2797, ext. 7111.

Sincerely,

A handwritten signature in cursive script that reads "Paul Kulpa".

Paul Kulpa, Project Manager
Office of Waste Management

cc: Matthew DeStefano, DEM OWM
Richard Gottlieb, DEM OWM
Kymberlee Keckler, EPA Region I
Cornellia Mueller, NSN

1479



30% post-consumer fiber

**Navy Response to RIDEM Comments
On the Site 08, NUSC Disposal Area
Soil Removal Action Work Plan
(RIDEM comments dated Feb 28, 2005)**

*1. Section 1.2 Scope,
Page 1*

The scope should include a section on regulatory notification. The NUSC Disposal Area is located on a secured location of the NUWC complex. In order to facilitate regulatory inspections a weekly updated schedule of upcoming field activities must be submitted to the regulators. In addition, as proposed schedules are dynamic forty-eight hour notification is required for the initiation of field activities and when possible 24-hour notification is requested for the cancellation of field activities. Finally, at other actions taken at the base notification was not given simply due to the fact that the entity responsible for notification was not stipulated in the work plan. In order to avoid this problem the work plan must stipulate which entity will be responsible for providing the necessary notification to the regulators.

Navy Response: Regulators will be notified of work schedules through the Activity environmental IR manager. Likewise, regulators must coordinate with the Activity Environmental IR manager for access to visit the site. Changes to the work plan concerning this issue are not necessary.

Evaluation of Response

Comment has been addressed

*2. Section 1.2 Scope, Excavation of Buried Drums
Page 1*

The plan notes that soils will be excavated 15' from center of TP-12, (approximately 88 CY). The Navy is conducting a drum removal action, which may extend well beyond the limits delineated above. In order to avoid confusion in the field the work plan should stipulate that the minimum anticipated removal area is 15 feet from center of TP-12. The actual removal area will be based upon observations made in the field. Please modify this and corresponding sections of the work plan.

Navy Response: The work plan is correct as written. The scope of this effort is limited to removing any drums that exist within 15 feet of the recovered drum. If drums are identified beyond this radius, the Navy will consider expanding the scope of this removal action dependent on budgetary issues.

Evaluation of Response

Comment has been addressed

3. Section 1.2 Scope, Excavation of Buried Drums Page 1

During a drum removal action a metal detector is typically employed as an aid to ascertain the extent of drums in the area. Although the site was a rubble disposal area, interferences from other metallic sources may be limited as a number of the test pits dug at the site had little to no metallic debris. Please modify the work plan to state that a metal detector will be employed to investigate suspect areas. In addition, test pits should be dug radially outward from the excavation to confirm that all of the drums have been removed.

Navy Response: The Navy disagrees. This is a removal action with a limited scope, not a remedial investigation.

Evaluation of Response

While the scope of the removal action may be limited due to budgetary issues, the Navy is still responsible for determining the effectiveness of the removal action, that is whether the Navy was successful in removing all drums and/or contamination at this location. This is typically accomplished by employing a metal detector and digging test pits as noted in the comment. Neither of these operations are considered time consuming or expensive. In regards to the metal detector one merely walks radially out from the perimeter of the site with a detector. As the backhoe is already onsite it will take little time or effort to dig radial test pits. In consideration of the above, the Office of Waste Management reiterates its comment

4 Section 1.2 Scope, Sampling and Analysis Page 2

This section of the plan discusses sampling of excavated soils from the site. Samples must also be taken from the base and the sidewalls of the excavation. These samples will either serve as confirmatory samples to confirm that all contaminated soils have been removed and/or investigation samples to better characterize the site. Please modify the report to include these samples.

Navy Response: The Navy disagrees. This is a removal action with a limited scope, not a remedial investigation. However, if portions of the excavation are believed to be clean after the removal action effort, the Navy will collect base and sidewall confirmatory samples through our CLEAN contract.

Evaluation of Response

Confirmatory samples are always collected at removal actions limited or otherwise. This is a standard practice, which is designed to determine the effectiveness of the remedial action. Therefore, the Office of Waste Management reiterates it's position that confirmatory samples must be taken.

***5. Section 1.2 Scope, Grading, Backfill and Compaction,
Page 2***

Prior to backfilling it may be necessary to place poly or filter fabric at the base of the excavation in order to demarcate the contaminated soil from the clean backfill. Please modify the work plan to include this provision

Navy Response: For the buried drum area, the work plan will be revised to indicate that, in areas where imported clean backfill is used, the excavation will be lined with poly or filter fabric to demarcate the contaminated soil from the clean backfill. If existing material is used for backfill, demarcating the area will not be necessary. For the buried metal container area, lining the excavation will not be accomplished because placing "smooth" materials on the steep slope would provide a higher probability of slope failure and backfill materials could end up in the stream during a significant rainfall event.

Evaluation of Response

Comment has been addressed

***6. Section 1.2 Scope, Seeding, Fertilizing and Mulching,
Page 2***

The work plan proposes seeding the area with Park Mix grass. Reseeding with native grasses is preferable as it requires less fertilizer and watering, is hardier and provides better habitat for wildlife.

Navy Response: The work plan will be revised to indicate that reseeded will be done with a seed mix that matches the existing grasses as closely as possible.

Evaluation of Response

Comment has been addressed

***7. Section 1.2 Scope,
Page 2***

This scope section of the report should note that a close out report will be required once the remedial action is completed.

Navy Response: The Close-Out Report will be added to the list of activities in Section 1.2. The requirement for the Close-Out Report, and its components, is stated in Section 3.17.

Evaluation of Response

The Revised Work Plan states that the Close out report will contain any other pertinent documents. Please confirm that the Close Out Report will include the following:

Figure depicting the location of the removal actions.

Figure containing the length, width and depth of each removal action

Figure depicting the location of any confirmatory samples taken at each location.

Table delineating analytical parameters associated with waste classification, confirmatory samples, etc

Table of field screening results (PID/FID readings, etc).

"Hit" table for all constituents detected in waste piles, confirmatory samples, etc.

Description of materials removed from excavations (i.e. presence of drums visually contaminated soil, free product, etc).

Description of interior of excavations before backfilling, (i.e. whether staining, waste or other indicators of contamination is present, etc.).

Table delineating the volume of waste removed at each location.

Table delineating final disposal location for each removal action.

Representative photographs taken at site (RIDEM request a copy of all photographs taken at site.)

Cost Table

Letter from Navy stating that the Navy accepts the work.

8. *Section 3.8, Work Area layout Scope,*
Page 9

The work plan notes that excavation will not continue into to the water table except for drum removal. Please be advised that free product must be addressed in any media. Therefore, if saturated soils are found in the excavation it should be removed. Similarly, if free product is found on the water table action should be taken. Please modify the work plan to address these contingent issues. The Office of Waste Management is aware that if the free products extend beyond the area of the drum removal the Navy may wish to continue the removal of the free product at a later date.

Navy Response: The Work plan will be edited to indicate that absorbent pads will be used to address limited LNAPL free product that is encountered during excavation. Please note that this is a removal action with a limited scope and limited budget. A Remedial Investigation will be conducted at the site in the future.

Evaluation of Response

Please be advised that the Navy is responsible for the remediation of free product at the site. This may necessitate the removal of contaminated soils in the water table. Alternatively, as a low cost, interim measure to facilitate in its removal the Navy may install a perforated eight-inch diameter PVC pipe and backfill the areas to the top of the water table with crushed stone. The later measure may also serve to monitor free product in the area.

9. Section 3.8, Work Area layout Scope, Page 9

The work plan must stipulate that free product in any media encountered during the removal action will be sampled and analyzed.

Navy Response: This is a removal action with a limited scope and limited budget. A Remedial Investigation will be conducted at the site in the future. However, if free product is encountered, and if the schedule and budget allows, the Navy will collect samples through our CLEAN contract.

Evaluation of Response

The removal action is schedule to occur in essentially two limited areas. As such, it is not anticipated that a large number of free product samples will have to be collected. Therefore, minimal cost are expected to be associated with this analysis. If the budget is exceeded, please indicate whether Naval Station Newport has the necessary discretionary funds to perform this analysis.

10. Section 3 92, Buried Metal Container Area Page 11

The work plan states that clean soils with no debris will be field screened and stored accordingly. The work plan has not specified how the soil will be screened. Considering the fact that the main contaminant of concern is lead it is assumed that a field XRF will be employed. Please confirm that this is the case.

Navy Response: The Work Plan will be edited to include visual, olfactory and PID screening. The PID threshold of 10 ppm will be used for designating soil, which requires further characterization. No field screening for lead is proposed.

Evaluation of Response

Unless it can be demonstrated that there are constituents of concern that can be detected with a PID/FID use of these instruments at this location will have very limited utility.

The Office therefore reiterates its comments that a field XRF for lead should be employed.

*11. Section 3.92, Buried Metal Container Area
Page 11*

The work plan calls for the removal of cans and soils from the site. However, it has not specified whether confirmatory samples will be collected prior to backfilling. Samples must be taken prior to placing clean fill at the site and/or terminating the removal action. These samples may either serve as confirmatory or investigation samples. Poly must be placed in the area prior to backfilling, unless the confirmatory samples indicates that contamination is not present.

Navy Response: This is a removal action with a limited scope, not a remedial investigation. However, if portions of the excavation are believed to be clean after the removal action effort, and if the budget and schedule allows, the Navy will collect base and sidewall confirmatory samples through our CLEAN contract.

Evaluation of Response

Confirmatory samples are always collected at removal actions limited or otherwise. This is a standard practice, which is designed to determine the effectiveness of the removal action. Therefore, the Office of Waste Management reiterates it's position that confirmatory samples must be taken

*12. Section 3.12.1, Backfill
Page 12*

The work plan must stipulate that prior to backfilling the depth width and length of the excavations will be documented and the locations will be GPS. To avoid problems that have occurred in the past the area will be GPS prior to backfilling. This will ensure that the correct area is GPS.

In consideration of the accuracy of GPS and in order to facilitate finding the area in the future, if contamination is still present, the areas should be outlined with stakes after backfilling. Please modify the report to include this requirement.

Navy Response: The Work Plan will be revised to indicate that sketches of the affected areas will be provided in the close out report. Additionally, the limits of the excavation areas will be staked with PVC pipe.

Evaluation of Response

Comment has been addressed.