



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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December 8, 1998

Al Haring, Director
U.S. Department of the Navy
Northern Division, Environmental Restoration Division
Naval Facilities Engineering Command
10 Industrial Highway
Code 1823-Mail Stop 82
Lester, PA 19113-2090

RE: Surface Soil Sampling, Old Fire Fighter Training Area;
Naval Education and Training Center, Newport, Rhode Island

Dear Mr. Haring,

Thank you for your response to my November 12th letter in which I raised a number of concerns in regards to the Work Plan for surface soil sampling at the Old Fire Fighter Training Area at NETC in Newport, Rhode Island. Prior to your formal response, which arrived after the sampling had been completed, we discussed the issues during a telephone conversation.

As you aware, our primary concern pertains to the appropriate depth for surface soil sample collection. As stated in our letter and in Work Plan development meetings, RIDEM requires samples be collected from the zero to two-foot interval. As stated in your response, the Navy would not meet this requirement and would defer to EPA's requirement of zero to one foot. While the zero to one-foot horizon may be beneficial in answering the short-term exposure questions, it will not provide us with the answers necessary to address the long-term cleanup of the site. As we have previously stated, RIDEM will not support reopening the site until such time that a long-term solution for site cleanup is proposed.

Please note that both the Navy and the EPA have been fully aware of RIDEM's regulatory requirements for the collection of surface soils samples from the zero to two-foot interval. RIDEM has provided both parties with this information in historical correspondence and the Navy is meeting this very requirement (with EPA's concurrence) at the NCBC facility in North Kingstown.

Your written response states that "we believe exposure to soil 1 to 2 feet below the ground surface is not a complete pathway. Furthermore collection of soils at these depths would not be consistent with other samples collected at the Naval Base." Please note that it is not RIDEM's position that the one to two-foot interval be sampled and that the zero to one-foot interval be ignored. Rather, the requirement is that the zero to two-foot interval be sampled with a preference given to areas that exhibit contamination. This is an important distinction. Also, I find it interesting that the recent EPA survey that was released to the local community asks parents if they ever observed their

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children digging holes greater than "12 inches deep or more." Based upon this question, it would appear as though EPA has not ruled out this depth as an incomplete pathway.

Furthermore, during the public meeting sponsored by Representative Patrick Kennedy, one parent specifically expressed concern that her child might have been exposed to soils at depths greater than one foot. This information lends further justification to our sampling requirement in order to answer questions like this and resolve fears of exposure from activities at the site.

In regards to the issue of consistency raised in your letter and as previously stated, the Navy routinely collects surface soil samples within the zero to two-foot interval at NCBC which is also a Federal Facilities National Priorities List Site. In addition, the Navy has recently collected surface soil samples from the zero to two-foot interval at the nearby Melville North Landfill.

There is one final and very important justification that supports the zero to two-foot sampling depth at this particular site. Regardless of all the legal and regulatory requirements, the simple fact of the matter is that based upon our investigations of this site, we know that the greatest contamination starts at about one foot and extends down from there. Based upon this knowledge alone, common sense dictates that the Navy should have sampled to depths greater than one foot at the Old Fire Fighter Training Area site.

In closing, RIDEM will not be able to concur with a risk assessment and ultimately, a long-term cleanup plan that is based solely upon samples collected from zero to one foot. Therefore, we would not be able to support the reopening Katy Field until our concerns are addressed.

Please contact Paul Kulpa at (401) 222-2797, ext. 7111 or me at extension 7137 if the Navy has any additional questions regarding this issue or would like to meet to discuss a plan of action to address our concerns.

Sincerely,



Warren S. Angell II, Supervising Engineer
Office of Waste Management

- cc: Edward Szymanski, Associate Director, DEM
Terrence Gray, Chief, DEM OWM
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