



State of Rhode Island and Providence Plantations
D partm nt f Environmental Management
Office of Waste Management
235 Promenade Street
Providence, RI 02908

May 23, 1997

James Shaffer, Remedial Project Manager
U.S. Department of the Navy
Northern Division
Naval Facilities Engineering Command
10 Industrial Highway
Code 1823-Mail Stop 82
Lester, PA 19113-2090

RE: Tank Farm # 4, Naval Education and Training Center, Newport, Rhode Island

Dear Mr. Shaffer,

The Office has received, on 13 May 1997, the Navy's tank interior and soil sampling plan for the underground storage tanks at Tank Farm # 4. Attached are comments generated on said plan. Please be advised that the Office considers the sampling delineated under this plan as a limited effort designed to expedite demolition of the tanks. Since this plan is limited in scope, it will not meet the Navy's obligations to investigate sludge disposal practices at the site. As previously discussed, additional work and sampling will have to be taken in order to meet this requirement. Therefore, the Navy cannot consider the action taken under this investigations as sufficient for meeting the aforementioned obligations. Finally, be advised that additional correspondence will be forth coming concerning groundwater issues at the site.

Please contact this office at 401-277-3872 ext. 7111 if you have any questions concerning this matter.

Sincerely,

Paul Kulpa

Paul Kulpa, Project Manager
Office of Waste Management

cc: Warren S. Angell, DEM DSR
Richard Gottlieb, DEM DSR
Kymberlee Keckler, EPA Region I
Brad Wheeler, NETC
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**Comments on Tank Interior and Soil Sampling
Tank Farm # 4, NETC**

1. The Work Plan calls for VOC analysis for two soil samples per tank. Please be advised that all soil and chip sampling will have to undergo full VOC analysis including analysis for ethylenedibromide (note minimum detection limits must allow for comparison to State regulations).
2. The Work Plan indicates that soils to be excavated from the site will not exceed a depth of three feet below the top of the tank. It is assumed that this is the area which will be disturbed during any demolition activities. The Work Plan should note that additional soils may be removed if it is determined that demolition activities will affect these soils.
3. The Work Plan indicates that a FID will be used in the screening process. Although not stated it is assumed that, if appropriate, other field observations, visual, olfactory, will be used in this endeavor.
4. The Work Plan contains a typographical omission. The plan states that soils samples will be compared to RIDEM residential standards. The report should note that soil and chip samples will be compared to residential standards. In addition, the Plan should note that if chip samples exceed these standards additional remedial action may be warranted, such as recleaning the interiors of the tanks.
5. The plan states that if standards are not exceeded at a test pit the soils associated with the test pit will be suitable as back fill. Although not stated, it is assumed that, if there are visual or olfactory signs of contamination these soils will not be used as backfill, independent of the analytical results, (chosen TPH analysis is based upon the Navy's statements that heavy oils were stored at the site, if lighter oils are present, the chosen test method may not detect these fuels). In addition, it is assumed that any soils outside of the test pit areas will not be used as clean fill if they exhibit contamination.
6. The report indicates that chip samples will be collected from the interior of the tanks. Please note that these samples should be collected in such a manner so that there will be no contaminant loss during the collection process. The Office recommends that the samples be collected manually using a hammer and chisel.
7. The report indicates that as a contingency two additional tanks may be sampled after placement of slurry, if it is apparent that the staining is worse than in the previously sampled tanks. The Plan contains a typographical error. The report indicates that the two additional tanks may be sampled after placement of the sand slurry. Obviously, if the sampling results indicated that additional cleaning is required then the sand which has been placed in the tanks will have to be removed in order to accomplish this task. Therefore, the report should note that these two additional tanks will be tested in a manner similar to the other tanks at the site, namely samples will be collected prior to the placement of the sand slurry. Finally, as implied in the Work Plan analytical testing is being performed on a subset of the tanks to determine if additional remedial efforts are required prior to demolition. Therefore, the results of this testing will be used to determine whether non tested tanks require remediation. Obviously, this will necessitate

that none of the tanks be backfilled with slurry until the results of the chip sampling has been received.