



DEPARTMENT OF THE NAVY
 NAVAL EDUCATION AND TRAINING CENTER
 NEWPORT, RHODE ISLAND 02841-5000

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 IN REPLY REFER TO

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 Ser 111 / 424E
 17 MAY 1990

State of Rhode Island
 Department of Environmental Management
 Division of Water Resources
 Permits and Planning Section
 Attn: Mr. Angelo Liberti
 291 Promenade Street
 Providence, RI 02908

Dear Mr. Liberti:

As you mentioned at our meeting on 27 April 1990 concerning the discharge of water from Tanks 53 and 56 in Tank Farm 5, we propose the following sampling and monitoring plan. The treatment system shall consist of an oil-water separator; a counter-current air stripper followed by two carbon absorption units, in series. At present, we propose to discharge the water via the temporary outfall at the Navy's Pier II. The sampling and monitoring plan for the treated water from the tanks and dewatering operations is the following:

1. Monitoring will commence at the beginning of the treatment and discharge using a portable gas chromatograph until all water is removed from the tanks and water from dewatering operations is completed. The portable gas chromatograph (GC) will be capable of detecting priority volatile organic compound (VOCs) pollutants identified in the untreated water to levels less than 5 ug/l (micrograms per liter). The flow rate will be monitored daily every eight hours and readjusted, if necessary.
2. Treated effluent will be sampled daily every 8 hours after carbon absorption for 2 cycles of carbon (assume that 1 cycle of carbon equals 14 days based on bench scale testing results). Sampling will occur from the effluent of the second carbon absorption unit.
3. Discharge will cease whenever any of the following concentrations are reached (breakthrough point) in the effluent as detected by the screening or confirmational GC tests:

1,1-Dichloroethane	14 ug/l
Chloroethane	14 ug/l
Vinyl chloride	8 ug/l
Any other priority VOC	10 ug/l
Any priority Acid-Base/ Neutrals	10 ug/l

The discharge will recommence after the carbon absorbers have been replaced.

4. Carbon effluent samples will be analyzed by a certified laboratory for volatile priority pollutants using EPA Method 624 on days 7, 10, 12, and 14 for the first 2 cycles of carbon to verify portable GC results.

5. A sample of the carbon effluent will be analyzed by a certified laboratory for semi-volatile organic analysis (EPA Method 625) every 7 days for the duration of treatment.
6. Based on experience gained during the first 2 carbon exhaustion cycles, VOC testing for the remainder of the project will be reduced as follows:
 - On-site GC screening tests: once per day
 - Confirmation tests by certified laboratory: daily beginning two days prior to the previously observed breakthrough point.
7. Monitoring results will be forwarded to RIDEM monthly for the duration of the treatment process.

We request your approval of this sampling and monitoring plan. To date, the City of Newport has not determined if they will accept the discharge of the treated water to the sanitary sewer system. In either case, we propose to use this plan for the treated water discharge. Your timely review of our plan is appreciated, so that it may be incorporated into our contractual documents by 25 May.

If you have any questions, our point of contact is Rachel Marino at 841-3735.

Sincerely,



HAROLD B. BELSON
Director of Engineering
By direction of the Commander

Copy to:

Ms. Cynthia Gianfrancesco, RIDEM
Division of Air and Hazardous Materials

Mr. Richard Hood, ERA

→ Mr. Brian Helland, NORTHNAVFACENGC0M (Code 1411)