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RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
235 Promenade Street, Providence, RI 02908-5767 TDD 401-222-4462

September 3, 2004

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

RE: Remedial Investigation Work Plan, Site 17, Building 32 Gould Island, Naval Education and Training Center, Newport, Rhode Island

Dear Mr. Frye,

The Rhode Island Department of Environmental Management, Office of Waste Management (RIDEM) has reviewed the Remedial Investigation Work Plan, Site 17, Building 32 Gould Island. Attached are comments generated as a result of this review.

The Navy has limited the investigation to Building 32. The other potential source areas such as the Power House, the Acetylene Generator Building, known petroleum release areas, etc. can be investigated either as a SASE site under the Federal Facilities Agreement, or as separate sites under the State Program

If the Navy has any questions concerning the above, please contact this Office at (401) 222-2797. ext. 7111. The Office of Waste Management looks forward to working with the Navy on the current project, Building 32, as well as the future projects, the other aforementioned source areas.

Sincerely,

Paul Kulpa

Paul Kulpa, Project Manager
Office of Waste Management

cc: Mathew DeStefano, DEM OWM
Richard Gottlieb, DEM OWM
Kymberlee Keckler, EPA Region I
Cornelia Mueller, NETC

30% post-consumer fiber

Comments
on the Draft Final RI Work Plan,
Site 17, Gould Island

1. **General Comment.**

The Office of Waste Management agrees that due to funding and other considerations the other known and/or suspected areas of contamination on the northern end of the island, such as the Power House, the Acetylene Generator Building, the contamination east of the acid storage building, etc, can be addressed at a later date either as an additional SASE sites or sites under the State Program. In order to facilitate the eventual investigation and remediation of these sites, please indicate whether the Navy wishes to investigate the sites as SASE sites or as State sites.

2. **Section 1.5, Schedule and Regulatory Oversight,**
Page 1-6.

This section of the work plan states that oversight parties will likely have to provide their own transportation to the site due to potential liabilities for water travel. During the previous remedial investigations of Building 32, the tanks removals at Building 44, the Power House, and Building 32, the investigation of Building 44, the investigation of Buildings 41, 53,54, 56,58,59 and 60, the demolition of Building 32,33, 41, 53, 54,56,58, 59, and 60, the remedial actions at Buildings 53, 54,56,58,59 and 60 the Navy provided transportation to and from the sites. Transportation was also provided to members of the RAB, and government representatives, such as Senator Chaffee. Since the Navy has a variety of small and large boats available to them, in all of these cases the Navy was able to provide the necessary transportation. The Office of Waste Management questions why providing transportation to the site for the current investigation represents a problem. Please be advised that assuming RIDEM's inspector will make an average of two inspections per week and that the investigation will last for six months (52 trips) and additional $41,600 will need to be added to the DSMOA to cover these costs. (Cost based on chartered boat @ $800/day).

3. **Figures 3-1, 3-2 3-1,**
Page 3-5, 3-6.

Please depict the location of SB 339.

4. **Table 3-1,**
Page 3-7.

Borings SB330, SB 329, SB 307 and SB 308 are stated as being designed design to investigate UICs. Boring SB 330 is through the center of the main room in the Acetylene Generator Building. Please indicate where the UIC is located in the main room as it was not visually apparent during an inspection of the building. The same statement hold true for SB 329, SB 307 and SB 308. Also it should be noted that the acetylene sludge tanks, which are located east of the main room contained pipe penetrations on the east wall of the tanks. Finally, the Navy has indicated that the other source areas outside of Building 32 will be investigated at a latter date. Since the proposed sampling scheme at the Acetylene Generator Building does not call for the investigation of the sludge tanks and associated piping network, and as such cannot be considered an adequate investigation of the building, it is assume that the proposed borings are associated with Building 32. Please confirm.

5. **Table 3-1,**
Page 3-7.

In the northwest corner of Building 32 elevated soil gas readings have been reported for both naphthalene and TCE. The proposed boring locations will not intersect these areas. Please install a boring at this location.

6. **Table 3-1,**
Page 3-7.

An isolated area of TCE was detected in the soil gas sample taken outside of the northeast corner of Building 32. Historically a series of buildings were located on the eastern side of Gould Island. It is not possible to ascertain whether the elevated reading was associated with activities at Building 32 or one of the adjacent buildings. It is recommended that a boring be placed at this location to investigate this potential source area.

7. **Table 3-1,**
Page 3-7.

Elevated levels of TPH were found in soil gas samples taken at three locations along the outside western wall of Building 32. These areas should be investigated with a geoprobe.

8. **Table 3-1,**
Page 3-7.

There are a number of catch basins and man ways in the general vicinity of Building 32 and throughout the northern end of the island. The catch basin and man ways should be investigated to ascertain whether they are UICs and/or contain sludges or other forms of contamination. This can be done either under the current work plan or as part of the work plan for the other sites on the island that will be investigated either as SASE sites or State sites.

9. **Table 3-1b,**
Page 3-10.

The table states that MW 304, SB 309-310 are designed to investigate potential TCE source areas. The justification for the location is based upon a soil gas survey map presented in Appendix A. Appendix A contains the soil gas survey map for Building 32, not the area outside of Building 32. Please submit the referenced map. Be advised that the Office of Waste Management has question the location of the location of these wells. Upon receipt of the aforementioned map the Office will finalize its position concerning this matter.

10. **Section 3.2.1.2, Subsurface Soil Acquisition**
Page 3-13.

The report notes that TPH samples will be limited to diesel range organics. Please provide justification for this limitation. This justification should include a list of tanks found on the northern end of the island and the corresponding fuels associated with the tanks, and whether torpedo fuel can be detected by either a GRO or DRO test.

11. **Section 3.2.1.2, Subsurface Soil Acquisition**
Page 3-13.

Soil boring are proposed for collecting soils beneath the acid sumps of the acid storage shed and the sand blasting boot. In previous correspondence this approach was deemed inappropriate for the following reasons. The condition at he base of these sumps are not known, that is, it is not known whether these sumps are compromised, contain a drain etc. If a drain is present it will have to tracked to see if it discharges directly into the ground, discharges into a leach file or is connected to the drainage system. In order to make this determination it will be necessary to excavate the sumps in order to perform an inspection and if necessary track any drains if present. Placing a single boring through the sump will not provide this information.

Therefore, at these locations or any other location where the conditions at the base of the sump is not known the sump will have to be excavated, inspected and if present any drains will have to be tracked. Please modify the work plan to reflect these requirements.

12. Section 3.2.1.2, Subsurface Soil Acquisition
Page 3-13.

The work plan notes that two-inch split spoons using direct push technology will be employed at the site. Please be advised that poor recovery was experienced during the split spoon effort associated with the transformers. Improve recovery was realized when a core catcher was employed. Therefore, the work plan should specify that a core catcher will be used at the site.

13. Section 3.2.1.7, Groundwater Sampling
Page 3-25.

The work plan notes that low flow methods will be used to collect groundwater samples from the site. Placement of the low flow sampling devise is crucial to ascertaining whether groundwater contamination is present. Field observations, such as the presence of LNAPL or DNAPL, the results from soil borings, etc are used to determine where the probe should be placed. Additional information can be obtained by taking conductivity readings and PID jarhead readings from the development water as the purge pump is slowly raised through the length of the well screen. The work plan should specify that all of these field observations will be evaluated in order to determine the best location for the low flow-sampling device.