



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

Department of Environmental Management
DIVISION OF SITE REMEDIATION
291 Promenade Street
Providence, R.I. 02908-5767

June 22, 1995

Deborah Carlson, 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: Work Plan for On-Shore Site Assessment Screening Evaluation Former Derricks
Shipyard, NETC, Newport, Rhode Island.

Dear Ms. Carlson:

Please find attached comments generated by the Division on the above Work Plan. If you have any questions concerning the comments, please contact me at (401) 277-2797, ext. 7111.

Sincerely,

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

Paul Kulpa
Division of Site Remediation

cc: Warren S. Angell, DEM DSR
Richard Gottlieb, DEM DSR
Kimberly Keckler, USEPA Region I
Brad Wheeler, NETC

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**COMMENTS FOR:
WORK PLAN FOR ON-SHORE ASSESSMENT
SCREENING EVALUATION**

**FORMER DERECKTOR SHIPYARD
NAVAL EDUCATION & TRAINING CENTER
NEWPORT, RHODE ISLAND**

**1. Page 1-4, Section 1.2, Project Operations and Responsibilities;
Paragraph 3.**

This section of the report discusses project operations and organizations. The report should include a section dealing with regulatory notification. The State requires one week notification prior to the commencement any field activities and a 48 hour and 24 hour notification for changes in the schedule. Please provide at least a 24 hour notice for the cancellation of any activities. The Division recommends that a copy of the weekly schedule of upcoming field activities used by the consultant be faxed to the State.

**2. Page 2-7, Section 2.6, Recommendations;
Paragraph 6.**

As part of the development of the work plan, the recommendations of the PA were reviewed to determine applicability and need. Those that still require implementation are presented below.

The report should list the different recommendations or areas of concern in the PA and state the rationale for not conducting additional investigations at certain locations.

**3. Page 2-7, Section 2.6, Recommendations;
First Bullet.**

Please be advised that this aspect of the project may not be necessary as the Navy is proposing to remove sandblast grit (black beauty) as part of the supplemental environmental project now being negotiated between EPA, Navy, and RIDEM.

**4. Page 2-7, Section 2.6, Recommendations;
Second Bullet.**

Please state very briefly what the findings of the asbestos survey revealed.

**5. Page 2-7, Section 2.6, Recommendations;
Third Bullet.**

The NETC has investigated historical records for Building 62 and has found no evidence of the existence of UST at this location.

This section of the reports states that additional investigation is not warranted around Building 62 based upon historical records and present use of the area. The Division is aware that the records in the subject area are not complete. Therefore, the absence of historical records can not be used to preclude additional remedial investigations.

**6. Page 2-7, Section 2.6, Recommendations;
Third Bullet.**

This section of the reports states that UST were removed from Buildings 5 and 234; however, suspected USTs were not located. The report also states that additional USTs actions will not be considered as part of this Work Plan.

The Work Plan should indicate how these USTs were located, historical records, magnetometer survey, etc. In addition, the report should indicate why "additional UST remedial actions" are not being conducted under this study. Please be advised that USTs which do not contain petroleum products may be subject to investigations under this program.

**7. Page 2-8, Section 2.6, Recommendations;
Second Bullet, Paragraph 2.**

Slab sampling will be conducted if the buildings or slabs are scheduled to be demolished or removed as part of a RI and FS process.

The above statement implies that the buildings or slabs will be sampled only if they are to be demolished or removed during the RI and FS process. This obviously must be a typo since the purpose of the RI and FS is to determine whether said buildings or slabs need to be demolished or removed. Please state which slabs or buildings that have stained floors will be sampled as part of this investigation.

**8. Page 3-2, Section 3.2.1, Task 1; Mechanical Pits and Trenches Inspection;
Paragraph 3.**

Pits and trenches that have outlets but no identifiable outfall will be assumed to discharge to the ground surface.

Based on the above statement it would seem more reasonable to assume that the outfalls discharge into the ground since they can't be seen, therefore it should be

assumed that they are UICs.

9. Page 3-2, Section 3.2.1, Task 1; Mechanical Pits and Trenches Inspection; Paragraph 7.

After inspections, all pits and trenches will be numbered, securely covered with steel plates, and sealed with silicone caulking.

The above should be modified as follows:

After inspections, all pits and trenches will be numbered, photo documented (copies of photos will be sent to the State), securely covered with steel plates, and sealed with silicone caulking.

10. Page 3-3, Section 3.2.2, Task 2: Underground Drainage Systems Tracking and Clearing; Paragraph 4.

This paragraph notes that culverts and floor drains in the central shipyard area, building 234, and the north waterfront will be tracked, cleared, and inspected to identify potential discharge areas. Please explain why this same search will not be performed for building 6, building 42, and the waterfront south of the present fence line at Pier 2 and north of the autoport gasoline station (located south of building 234).

11. Page 3-4, Section 3.2.2.1, Storm Drains/Catch Basins; Paragraph 2.

This paragraph notes that sediment in storm drains and catch basins will be removed and containerized for waste characterization. It is not clear from this discussion if discrete samples from each storm drain/catch basin will be obtained for analysis. Please clarify.

12. Page 3-4, Section 3.2.2.2, Floor Drains; Paragraph 2.

This paragraph notes that sumps will be pumped out and this fluid and any solid material will be removed and containerized for waste characterization. It is not clear from this statement if discrete samples from each floor drain or sump will be obtained for analysis. Please clarify.

13. Page 3-5, Section 3.2.2.2, Floor Drains; Paragraph 2.

Floor drains that have no identifiable outfalls will be assumed to discharge to the ground.

Please clarify if this sentence means that the discharge will be assumed to the ground surface or into the ground. It would seem that if no surface discharge point can be found then the flow is into the ground unless plans show the drain connecting into an underground conveyance system.

**14. Page 3-5, Section 3.3.1.1, Test Pit Excavation;
Paragraph 5.**

This section of the Work Plan delineates the areas where test pits will be excavated.

The report should include a caveat which states that as warranted, additional test pits may be used to investigate other portions of the site (for example, if there is evidence of an unknown underground structure, a test pit may be excavated in the area).

**15. Page 3-6, Section 3.3.1.1, Test Pit Excavation;
Paragraph 1.**

Excavated material will be returned to the test pits as backfill.

Please be advised that obvious forms of contamination such as 55 gallon drums, sludges, etc. cannot be returned to the test pit and must be dealt with in an appropriate manner.

**16. Page 3-6, Section 3.3.1.1, Test Pit Excavation;
Paragraph 1.**

Excavations will be halted at the top of the water table, if it is encountered.

The above statement implies that the test pits will be excavated to a predetermined depth. Please state the proposed maximum depths of the test pits.

**17. Page 3-6, Section 3.3.1.1, Test Pit Excavation;
Paragraph 2.**

This paragraph notes that six test pits will be excavated at even intervals alternating between the eastern and western sides of the piles. It is more prudent to have test pits located in stained or stressed vegetation areas, if they are present. If they are not present then the even spacing is acceptable

**18. Page 3-6, Section 3.3.1.1, Test Pit Excavation;
Paragraph 9.**

All test pits will be marked with stakes following completion.

The above should be modified as follows:

In order to allow for the collection of split samples and inspection, the State will be notified of test pitting activities. All test pits will be marked with stakes following completion, photo documented (copies of photographs will be sent to the State).

**19. Page 3-8, Table 3-1, Matrix of Field Samples to be Collected, CTO 173,
On-Shore Site Assessment Screening Evaluation.**

Please explain why target organics for the soil media are not being sampled as part of Task 3 (Test Pit Excavation).

**20. Page 3-11, Section 3.3.2, Task 4: Geologic/Hydrogeologic Investigation;
Paragraph 1.**

Due to the close proximity of this site to Narragansett Bay tidal influences must be evaluated as part of the groundwater studies.

**21. Page 3-11, Section 3.3.2.1, Investigation Target Areas;
Paragraph 2.**

Continuous samples will be collected during the boring advancement. The boring will then be backfilled to an appropriate depth for the well installation.

Please note that some of the wells must be screened at bedrock so that DNAPL presence can be determined.

**22. Page 3-13, Section 3.3.2.2, Advancement of Borings;
Paragraph 1, Sentence 1.**

This sentence notes that 12 borings will be advanced while Section 3.3.2.1 shows a total of 13 borings to be advanced (It is assumed that each bullet in Section 3.3.2.1 represents a boring). Please clarify.

**23. Page 3-13, Section 3.3.2.2, Advancement of Borings;
Paragraph 2.**

As each split spoon is opened the soils will be monitored for organic vapors with a FID.

The above should be modified as follows:

As each split spoon is opened a sample will be placed in a jar and a headspace reading will be collected for organic vapors with a FID.

**24. Page 3-14, Section 3.3.2.2, Advancement of Borings;
Paragraph 3.**

This section of the report deals with the sample designation. The report should note that a background overburden sample will be taken as part of the risk analysis.

**25. Page 3-15, Section 3.3.2.4, Groundwater Monitoring Well Installation;
Paragraph 2.**

Please note that groundwater wells must be constructed in accordance with the Rules and Regulations for Groundwater Quality, Appendix I (Monitoring Well Construction Standards and Abandonment Procedures) as amended July 1993.

**26. Page 3-15, Section 3.3.2.4, Groundwater Monitoring Well Installation;
Paragraph 2.**

The report has proposed using clean Silica sand # 20-30 in the annular space.

Please be advised that per regulations, the report should include a justification for the proposed grade of sand.

**27. Page 3-18, Section 3.3.2.5, Groundwater Elevation Survey;
Paragraph 1.**

This section of the report discusses groundwater elevation measurements.

The report should stipulate that all wells will be tested for NAPLs. (at a minimum an oil water interface probe will be used for this procedure). A discrete sample will be collected of any NAPLs.

**28. Page 3-18, Section 3.3.2.5, Groundwater Elevation Survey;
Paragraph 1, Sentence 3.**

This sentence notes that groundwater elevations will be measured one hour after high and low tide. Please explain how this time frame was selected.

**29. Page 3-19, Section 3.3.2.7, Groundwater Sample Collection;
Paragraph 3, Sentence 1.**

Please include turbidity as part of the sample measurements.

**38. Page 3-19, Section 3.3.3, Tasks 5 and 6: Underground Drainage Systems Sampling;
Paragraph 1, Sentence 2.**

Catch basins and sumps with unconsolidated bottoms will be sampled under Task 5.

Please clarify if basins and sumps with consolidated bottoms will be sampled.

**31. Page 3-22, Section 3.4, Investigation-Derived Waste (IDW).
Paragraph 2.**

Please note that IDW must be characterized and disposed of within 90 days if found to be hazardous.

**32. Page 3-23, Section 3.4.4, Aqueous Wastes;
Paragraph 1, Sentence 3.**

Those fluids exhibiting any detectable concentrations of target screening contaminants will be labeled.....

Please delineate at what level the screening equipment will be calibrated to detect the various constituents.

**33. Page 4-9, Section 4.1.3.4, trip blanks;
Paragraph 1.**

This paragraph notes that if more than ten VOC samples are in one shipment, one trip blank will be provided for each ten field samples. One trip blank should be provided for each shipment even if less than ten field samples are present.

**34. Page 4-10, Section 4.3.1, Sample Numbering;
Whole Section.**

Please state if the laboratory analyzing the samples will also see this numbering system. If so, they may be influenced by the duplicates, blanks etc. Please state what

numbering system the laboratory testing the samples will see.

**35. Page 5-1, Section 5.0, Reporting;
Paragraph 3.**

The site background sections will refer largely to the PA which was prepared under CTO 100. Activities at the site since the publication of the PA will be described in detail.

The above should be modified as follows:

The site background sections will include a copy of the background section from the PA which was prepared under CTO 100. Additional information discovered during this investigation and activities at the site since the publication of the PA will be described in detail and incorporated into the site background section.

**36. Page 5-1, Section 5.0, Reporting;
Whole Section.**

This section discusses the reporting format. The Work Plan has not specified the format for the tables or the figures. The Division recommends the following:

"Hit Tables" should be included for all of the matrixes samples. Concentrations of contaminants in these tables which exceeded background concentrations, regulatory standards or risk criteria should be delineated, (notation, shading, etc.).

Figures should include both aerial and cross sectional views. As appropriate, pertinent information such as concentration of contaminants, geology, maximum and minimum water table elevations, etc. should be included in the figures.

37. Table 3-1, Matrix of Sample to be Collected.

Target Organic Compounds include trichloroethene, tetrachloroethene, ethyl benzene and xylenes.

The report should justify the proposed list of target compounds, (ie, target compounds are representative of the chemicals used at the site.

38. Table 3-1, Matrix of Sample to be Collected.

Target Organic Compounds include trichloroethene, tetrachloroethene, ethyl benzene and xylenes.

The above should be modified as follows:

Target Organic Compounds include trichloroethene, tetrachloroethene, ethyl benzene and xylenes and total VOCs.

39. Table 3-1, Matrix of Sample to be Collected.

This section of the Work Plan proposes using field analysis for VOCs and metals. The Division recommends using field analysis for PCBs and TPH.

40. Table 3-1, Matrix of Sample to be Collected.

This table lists the various parameters to be tested for in the field samples.

The table should include a notation which stipulates that samples may be tested for TPH. The criteria for TPH analysis will be based upon field observations or site history. As an illustration of the latter, samples collected from suspected locations of USTs, mechanical pit sumps, liquid disposal areas, etc. would be analyzed for TPH based upon site history.

41. Table 3.2 Boring Well Installations:

The background monitoring wells are proposed to be located in the vicinity of fleet parking.

The report should indicate if there are any potential sources of contamination in this area.