



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203-0001

February 9, 1998

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

Re: Derecktor Shipyard Building S42-1 Sump Pit/PCB Soil Removal Action Work Plan

Dear Mr. Shafer:

EPA reviewed the *Derecktor Shipyard Building S42-1 Sump Pit Removal/PCB Soil Removal*, Naval Education and Training Center, Newport, Rhode Island dated January 5, 1998. EPA evaluated the report for technical adequacy, adherence to EPA guidance and generally accepted practice. Detailed comments are provided in Attachment A.

It is not clear why the work plan does not include excavation activities for sump pits S42-2, S42-3, S42-4, and S42-5. Will these areas be addressed in a separate removal action? The surficial sample collected from S42-2 had higher PAH concentrations than those detected at S42-1.

Once the PCB contaminated soil is placed in a roll-off, the roll-off should be labeled pursuant to 40 C.F.R. §761.45. A PCB warning label, "Caution contains PCBs," is required to be on the roll-off container if the soil contains 50 ppm of PCB or greater. The work plan should specify how the soil will be characterized with respect to its PCB content. How will a representative sample be collected to assess whether the soil contains greater than 50 ppm of PCB?

I look forward to working with you and the Rhode Island Department of Environmental Management toward the cleanup of Derecktor Shipyard. As we have discussed at previous remedial project manager's meetings, I think we should complete the removal actions on the onshore portion of the shipyard and then evaluate alternatives for both the onshore and the offshore in the FS that will be submitted in September 1998. Please do not hesitate to contact me at (617) 573-5777 should you have any questions

Sincerely,



Kimberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: Paul Kulpa, RIDEM, Providence, RI
Kevin Coyle, NETC, Newport, RI
Jennifer Stump, Gannet Fleming, Harrisburg, PA
Steven Parker, Brown & Root, Wilmington, MA
Mary Philcox, URI, Portsmouth, RI

ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. 6, §4.1.2	The work plan indicates that water will be sprayed, as needed for dust control. It would be better to indicate that a water “mist” will be used.
p. 8, §4.2.3	<p>Please identify the number of confirmatory samples to be collected from the sidewalls and floor of the excavation in the work plan.</p> <p>Olfactory field screening should not be performed for health and safety reasons. The work plan indicates that the soils under the sump pit will be field screened during the removal process using an FID, visual, olfactory, and FID jar head space. Please delete the word “olfactory” from the work plan.</p> <p>Although the Health and Safety Plan is referenced in the work plan, it does not acknowledge the potential that activities performed within the sump pit could be considered as confined space entry. I recommend that a confined space evaluation be performed and noted in the work plan.</p> <p>The work plan does not specify how the sump excavation will be left while awaiting analytical results of the confirmatory samples. Will steel plates be placed over the excavation?</p>
p. 8, §4.2.4	The work plan indicates that soils will be field screened during the PCB soil removal process using a FID, visual, olfactory, and FID jar headspace. Olfactory field screening should not be performed for health and safety reasons, the word “olfactory” should be deleted from the work plan. Due to PCBs low volatility and high chlorine content, neither a FID nor a PID is generally effective for detecting PCBs. If the boundaries of the excavation will be determined by a field screening technique, then another technique is needed. Either commercial field screening kits or a portable GC should be considered for the field screening. Also, please identify the number and orientation (<i>i.e.</i> , grid pattern) of soil confirmatory samples that will be collected for laboratory analysis in the work plan.