



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-831-5508

May 3, 2000

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: Derecktor Shipyard Building S42-5 Sump Pit Investigation of Inlet/Outlet Pipes, Naval Station Newport, Newport, Rhode Island

Dear Mr. Shaffer,

The Rhode Island Department of Environmental Management, Office of Waste Management, has reviewed the Plan for Derecktor Shipyard Sump Pit Investigation dated 7 April 2000. Attached are comments generated as a result of this review. If the Navy has any questions concerning the above, please contact this Office at (401) 222-2797 ext. 7111.

Sincerely,

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

Paul Kulpa, Project Manager
Office of Waste Management

cc: Warren S. Angell, DEM OWM
Kymberlee Keckler, USEPA
Melissa Griffin, NSN.

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**Evaluation of Navy's Response to Comments
on
Derecktor Shipyard
Building S42-5 Sump Pit Investigation/Removal**

1. General Comment

The Plan should stipulate that the removal actions will be photo documented and/or video taped. Key aspects of the project to be documented in this manner include the following: site conditions prior to removal action, condition of concrete vaults, pipes or other structures prior to removal, visible evidence of contamination observed during the action, confirmatory sampling, and site close out. In addition, the Office requests a copy of all photographs, video tapes and field notes taken during the removal actions. These items should be submitted to the Office at the end of the removal action.

Evaluation of Navy's Responses

The Navy has indicated that all pertinent features will be photo documented during the removal activities. Please confirm that these pertinent features include the items noted in the above comment and that field notes will be forwarded to the State.

2. General Comment

The Plan should include a section that discusses regulatory notification of field activities. The notification should, at a minimum, include the following: overall project schedule, weekly schedule of up coming field activities, and notification procedures for cancellation of field activities or changes in the project schedule. The DEM requires a seven day notice prior to the start of activities and when possible a twenty-four hour notification for the cancellation of field activities. Note, the Office considers project start up, condition of structures prior to demolition, confirmatory sampling and project closure as key aspects of the project.

Evaluation of Navy's Response

The Navy has indicated that a schedule will be provided and that one-week notification will be given. Please confirm that the other aspects of the notification process will also be addressed, i.e. cancellation, weekly updates.

7. General Comment

The Plan lists the various test methods to be employed at the site. Please include TPH analysis in this list. Please be advised that the test method must be capable of detecting the full range of petroleum hydrocarbons, and this may necessitate the use

of two different test methods.

Evaluation of Navy's Response

The Navy has stated that all samples will under go analysis using test method TPH 8015. Please confirm that this test method is capable of detecting the full range of petroleum hydrocarbons (light fuels to number 6). In addition, as the Navy has elected to employ a GC method, the following should also be stipulated in the Work Plan. Standards for the full range of petroleum hydrocarbons must be run on the same instrument used for site sample analysis. Historic standards for the same instrument cannot be used unless they are updated. All site samples must be run to baseline and all petroleum products must be identified. Finally, a copy of all GCs, standards and samples, will be submitted in the Close Out Report.

8. General Comment

The Plan does not provide details concerning sampling collection and preservation. It is assumed that standard practices, i.e. dedicated sampling devices, preservation with ice, use of thermometers in handling and shipping coolers, etc will be employed during this endeavor. In order to avoid potential confusion concerning this aspect of the project the Office recommends that these procedures be incorporated into the Work Plan.

Evaluation of Navy's Response

The Navy has indicated that the procedures outlined in the Melville Work Plan will be used at the site. The Melville Work Plan does not contain a detail outline of the sample preservation techniques. In addition, it is inappropriate to reference procedures outlined in another document from a different totally different site. Further, references another site Work Plan will lead to confusion as to which aspects of the Plan will be employed a this site. Therefore, in order to ensure that the correct sampling/collection procedures were employed a copy of the field notes for sample collection must be submitted to the State. Please be advised that detailed notes should be taken during the sample collection and preservation process.

**Additional Comments on
Derecktor Shipyard
Building S42-5 Sump Pit Investigation/Removal**

17. General Comment

The location of all existing structures or areas of contamination and any structures, areas of contamination, test pits, sampling locations etc. encountered during the removal action should be depicted on a scaled map of the site and included in the Close Out Report.

18. General Comment

The activities conducted at the site should be documented in the field and incorporated into the Close Out Report. This documentation should include, amongst other things, observations made prior to and during activities conducted at the site, (i.e. location of pipes, structures, stained soils, depth of pipes, dimensions of test pits, dimensions of removal areas or structures, etc.). In addition a copy of all field notebooks and field logs should be submitted to the State.

19. Work Plan, Page 1.

“In general, jar headspace results greater than 10 PPM will be suspected as being contaminated.”

Please revised the above as follows: In general, jar headspace results greater than 0 PPM will be suspected as being contaminated.

20. Work Plan, Page 2.

The requirements for sampling beneath the sump are not clear as it is implied that samples will be collected if contaminants are found. The Office is aware that it is the Navy’s intent to collect samples form beneath the sump independent of whether there is field evidence of contamination. In order to avoid confusion in the field this should be clearly stated in the Work Plan.

21. Work Plan, Page 2

“Samples will be collected at the discharge points of the lines, and biased towards areas that exhibit evidence of discoloration, elevated FID readings, positive Petro Flag results in excess of 500 mg/kg, and/or olfactory evidence”

Please revised the above as follows: Samples will be collected at the discharge

points of the lines, and biased towards areas that exhibit evidence of discoloration, elevated FID readings, elevated Petro Flag results, and/or olfactory evidence.