



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

December 20, 2004

Curt Frye, 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: Sand Blast Removal, Derecktor Shipyard, Naval Station Newport

Dear Mr. Frye:

The Office of Waste Management has reviewed the Sand Blast Removal Work Plan Derecktor Shipyard email, dated December 17, 2004. During activities associated with the construction of a defense-firing platform, at the former Derecktor Shipyard site, sand blast grit was uncovered. The previous studies performed on Derecktor Shipyard had not identified this location as an area of concern. In order to keep the construction project on schedule, and in consideration of the nature of the structure being built, defense firing platform, the Office of Waste Management has agreed to the Navy's request to expedite the review of the submitted work plan.

In order to facilitate development of the work plan, the Office of Waste Management has held discussions with the Navy and the United States Environmental Protection Agency concerning the scope of work to be performed. The submitted work plan essentially reflects the approach which was formulated in the aforementioned discussions. The attached comments are designed to clarify certain aspects of the work plan and to document the basis for the approach.

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

Office of Waste Management

cc: Mathew DeStefano, DEM OWM
Richard Gottlieb, DEM OWM
Kymberlee Keckler, EPA Region I
Cornellia Mueller, NSN

1738



**Comments on
Derecktor Shipyard
Sand Blast Removal Work Plan**

1. The proposed lateral extent of the excavation is 20x20 foot square. It is the Office of Waste Management's understanding that the proposed removal area exceeds the footprint of the defense tower and is designed so as to allow for additional removals in the future, if necessary, without compromising the tower and/or result in the removal of sidewalks, or other structures leading up to the tower. As this is a public document the rationale for the area of the removal should be noted.
2. Confirmatory samples are limited to specific metals and PCBs. It is the Office of Waste Management understanding that the Navy reviewed the results from the previous sand blast grit investigations and removal actions to ascertain the chemicals of concern for the site. As this is a public document, the Navy should note that the proposed list of confirmatory analytes reflects contaminants, which were detected in previous investigations and removal actions for Derecktor Shipyard sand blast grit.
3. Confirmatory samples will be limited to specific metals and PCBs. Although not stated in the work plan, the list of confirmatory analytes can be expanded if additional evidence of contamination is found. As an illustration, if petroleum contamination is uncovered TPH, VOC and SVOCs will be added the list of confirmatory analytes. This is standard practice for all confirmatory sampling efforts and this contingency should be noted in the work plan, as it is a public document.
4. The work plan notes that a close out report will be submitted with GPS data. Although not stated, it is assumed that the document will also contain all of the standard information such as, rationale for removal action, dimension of excavation, bills of lading or manifest for material transported off of the site, confirmatory sample results, etc.