

N62661.AR.002460
NS NEWPORT
5090.3a

RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT COMMENTS TO
DRAFT WORK PLAN ADDENDUM FOR STUDY AREA SCREENING EVALUATION SITE 19
WITH TRANSMITTAL NS NEWPORT RI
11/22/2010
RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT



RHODE ISLAND

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

22 November 2010

Winoma Johnson, P.E.
NAVFAC MIDLANT (Code OPNEEV)
Environmental Restoration
Building Z 144, Room 109
9742 Maryland Avenue
Norfolk, VA 23511-3095

RE: Draft Work Plan Addendum 1 for Study Area Screening Evaluation
Site 19, On-Shore Derecktor Shipyard, Naval Station Newport, Newport, Rhode Island

Dear Ms. Johnson:

The Office of Waste Management at the Rhode Island Department of Environmental Management has conducted a review of the *Draft Work Plan Addendum 1 for Study Area Screening Evaluation*, dated October 2010 and the Navy's responses to EPA's comments dated 29 October 2010 for Site 19, On-Shore Derecktor Shipyard, Naval Station Newport, located in Newport, Rhode Island. As a result of these reviews, this Office has generated the attached comments on the *Draft Work Plan Addendum 1 for Study Area Screening Evaluation*.

If you have any questions, in regards to this letter, please contact me at (401) 222-2797, extension 7148 or by e-mail at gary.jablonski@dem.ri.gov.

Sincerely,

Gary Jablonski, Principal Engineer
Office of Waste Management

cc: Matthew DeStefano, RIDEM
Richard Gottlieb, RIDEM
Kymberlee Keckler, USEPA Region I
David Dorocz, NETC, Newport, RI
✓ Stephen Parker, Tetra Tech

WP Add comltr 112210

**Draft Work Plan Addendum 1 for Study Area Screening Evaluation
Site 19, On-Shore Derecktor Shipyard, Naval Station Newport
Newport, Rhode Island
Dated October 2010**

Office of Waste Management's Comments:

1. Page 3-4, Section 3.3.2.1 Investigation of Target Areas; 1st and 2nd paragraphs.

Please be advised that the proposed borings locations, in this area around building 6, should be field adjusted appropriately if any visual field evidence of a release is observed in the nearby areas of these proposed boring locations and a sample for PCBs should be collected at the field adjusted locations. In addition it would seem prudent to conduct composite samples in the 0-1 foot interval on all four sides of the pads. Please include this sampling strategy in this section of the Work Plan.

2. Page 4-3, Section 4.1.1 Data Quality Objectives, Inputs to the Decision; 3rd paragraph, 2nd sentence.

"Comparison criteria to be used for soil analytical results will be the lower of: (1) U.S. EPA RSLs for Residential Soil (EPA, 2010), or (2) the RIDEM Industrial DEC (RIDEM, 2004)."

Please change "*RIDEM Industrial*" to "*RIDEM Residential*" in the above text in the Work Plan.

3. Page 5-1, Section 5.4 SASE Addendum - Additional Investigations; 2nd paragraph, 2nd sentence.

"The risk assessment processes to be used will be in accordance with current EPA risk assessment guidance (EPA, 1989), and other applicable general EPA guidance (EPA, 2001b)".

Please add the following text to the end of the above sentence in the Work Plan: "*as well as meet RIDEM requirements and approvals*".

4. Revised Figure 3-2A and EPA comments dated 11/22/10 on Figure 3-2A.

Please provide second updated figure from EPA comments dated 11/22/10 for RIDEM's review of the proposed locations.