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LETTER REGARDING REGULATORY COMMENTS ON DRAFT WORK PLAN ADDENDUM SUPPLEMENTAL REMEDIAL INVESTIGATION AT SITE 8 NETC NEWPORT RI
6/8/2010
RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
235 Promenade Street, Providence, RI 02908-5767 TDD 401-222-4462

8 June 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 Supplemental Remedial Investigation
Site 08, Naval Undersea Systems Center (NUSC) Disposal Area, 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 Supplemental Remedial Investigation*, dated January 2010 and the Navy's responses to this Office's and EPA's comments dated April 2010 for Site 08, Naval Undersea Systems Center (NUSC) Disposal Area, 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 Supplemental Remedial Investigation*.

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

Gary Jablonski, Principal Engineer
Office of Waste Management

cc: Matthew DeStefano, RIDEM
Richard Gottlieb, RIDEM
Ginny Lombardo, USEPA Region I
Cornelia Mueller, NETC, Newport, RI
Stephen Parker, Tetra Tech

WP Add comltr 060810

Draft Work Plan Addendum Supplemental Remedial Investigation
Site 08, NUSC Disposal Area, Naval Station Newport
Newport, Rhode Island
Dated April 2010

Office of Waste Management's Comments:

1. **General Comment.**

As stated in Section 1.1 of the *Draft Work Plan Addendum Supplemental Remedial Investigation* and in the Navy's response to EPA's comment 15: "*As stated in Section 1.1 of the Draft WPA (WPA) for the Building 179 CUST Area, the overall objective of the supplemental investigation is to determine the current nature and extent of contamination at the Building 179 CUST Area. This is consistent with the Navy's approach presented with their evaluation of EPA's request that the Building 179 Site be added as a second operable unit to Site 8, which was provided as an attachment to an August 31, 2009 letter to EPA and RIDEM from Tetra Tech, on behalf of the Navy. In their evaluation, the Navy advised that the supplemental investigation would be expanded to update the Building 179 groundwater contamination characterization. It was never agreed that a Preliminary Assessment/Site Investigation level-of-effort, beyond what was completed during the Navy's IAS, would be completed for the entire NUSC complex within the schedule provided for this supplemental investigation.*" Pursuant to the Navy's statements above, it is clear that this Work Plan Addendum is for the Building 179 CUST Area and minimum investigation at Building 185 Complex only and does not address this Office's previous concerns with other potential sources of contamination on the entire Site 08. Please be advised that this Office still has concerns with other potential source areas on Site 08 that have yet to be investigated and as such does not consider this Work Plan Addendum to be complete for Site 08. If it is the Navy's intention to focus solely on the Building 179 CUST Area and to t perform a minimum investigation on Building 185 Complex, please be advised that Naval Station Newport will be required to draft a separate work plan under the State Program for the investigation and remediation of the other source areas in the groundwater plume for Site 08.

2. **Page 1-2, Section 1.1 Background, <u>Building 179 CUST Area,</u> 3rd bullet.**

"Collect surface water and sediment samples from Deerfield Creek in the area upstream (south) of the Building 185 Complex, and analyze for <u>TCL semi-volatile organic compounds (SVOCs)</u>."

It would seem prudent to analyze the surface water and sediment samples for TCL SVOCs, TCL VOCs, TPH, 1,4-dioxane, PGDN, and cyanide during these supplemental investigations based on the following supporting statements made in this report: As stated on page 1-2, Section 1.1: "*The overall objective of this NUSC Disposal Area-Building 179 CUST Area supplemental investigation are: (1) to determine the current nature and extent of contamination at the Building 179 CUST Area*"; page 2-11 Section 2.2.2.3 Surface Water and Sediment Contamination Characterization Summary; "*Analytes reported in sediment*

samples from Deerfield Creek included VOCs, SVOCs, TPH, and cyanide. Additional investigation of the building 179 CUST Area surface water and sediment is recommended as the current surface water and sediment characterization is based on data collected ten years ago; current concentrations and distributions of contaminations in surface water and sediment must be established to adequately evaluate potential remedial responses for the NUSC Disposal Area/Building 179 CUST AREA"; page 2-15 Section 2.8.1 Physical Setting: "*Both overburden and bedrock groundwater flow discharges into Deerfield Creek.*"; and page 3-7, Section 3.2.1.11 Groundwater Sampling; *"groundwater samples will be sampled for TCL VOCs, 1,4-dioxane, PGDN, the main component of OTTO Fuel, cyanide;"* Please add the following analysis's to the text for surface water and sediment samples: TCL VOCs, TPH, 1,4-dioxane, RGDN, and cyanide.

3. **Page 3-2, Section 3.2.1.1 Geophysical Investigation; whole section.**

Packer testing of bedrock boreholes has been used very successfully on sites that this Office has overseen. The bedrock boring, by using the packer testing, can be evaluated by using inflatable packers to collect discrete groundwater samples at individual or specific zones of fractures. The packers also, allow you to conduct injection packer testing to estimate the zone of specific and bulk hydraulic conductivity of the bedrock. All of this information obtained through packing testing is a key component to determining the placement of the screen length in bedrock monitoring wells. Please add packer testing to this section.