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LETTER REGARDING REGULATORY COMMENTS ON DRAFT SAMPLING AND ANALYSIS
PLAN FOR CODDINGTON POINT BURIED DEBRIS AREAS WITH ATTACHMENT NS
NEWPORT RI
4/9/2013
RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

9 April 2013

Dominic O'Connor
NAVFAC MIDLANT (Code OPTE3)
Environmental Restoration
Building Z-144, Room 109
9742 Maryland Avenue
Norfolk, VA 23511-3095

Re: Draft Sampling and Analysis Plan (SAP)
Site 23 – Coddington Point, NAVSTA Newport, RI

Dear Mr. O'Connor,

The Office of Waste Management at the Rhode Island Department of Environmental Management has conducted a review of the *Draft Sampling and Analysis Plan (SAP)* dated January 23, 2013 for the Coddington Point Buried Debris Areas (Site 23), Naval Station Newport, located in Newport, RI. As a result of this review, this Office has generated the attached comments on the *Draft SAP*.

If you have any questions in regards to this letter, please contact me at (401) 222-2797, extension 7020 or by e-mail at pamela.crump@dem.ri.gov.

Sincerely,

Pamela E. Crump, Sanitary Engineer
Office of Waste Management

cc: Matthew DeStefano, DEM OWM
Richard Gottlieb, DEM OWM
Gary Jablonski, DEM OWM
Ginny Lombardo, EPA Region 1
Deb Moore, NAVSTA Newport
Neil Thurber, Resolution

**RIDEM's Comments (4/9/13) on the
Draft Tier II Sampling and Analysis Plan (1/23/13)
for the Coddington Point Buried Debris Areas
Naval Station Newport, Rhode Island**

General Comments:

1. RIDEM suggests that this SAP be rewritten to also include further investigation of asbestos-containing material (ACM) at Coddington Point. The investigations conducted to date at Coddington Point have not fully delineated the extent of asbestos contamination. Please revise this SAP to include further investigation of ACM at this Site.
2. Please explain in this SAP how the estimated extent of demolition debris as shown in Figures 4, 5 and 6 was determined. Please include a separate figure showing all locations where ACM was observed in comparison to the estimated extent of demolition debris. Please also indicate the areas where ACM has already been addressed.
3. Please note that all investigations and remedial actions conducted where asbestos is present must be conducted according to all applicable State regulations.
4. The purpose of this SAP is to investigate various buried construction debris areas. The Navy proposes to install borings across each area of concern (AOC) utilizing direct push technology or a hollow stem auger if necessary. Due to the nature of these AOCs, RIDEM strongly recommends that samples be collected via test pits at all locations in lieu of borings.
5. If the Navy does not agree to install test pits as suggested in Comment 4 above, please note that all areas where demolition debris exists need to be sampled. RIDEM reviewed the proposed soil boring locations shown on Figures 4-6, and requests that additional borings be installed at the Combat Training Pool (4 additional borings), the OTC Barracks (6 additional borings), the Naval Supply School (1 additional boring), and Bishop's Rock (1 additional boring). RIDEM suggests that a meeting be scheduled to discuss the locations of these additional borings for each area.

Specific Comments:

1. **p. 14, SAP Worksheet #10, Conceptual Site Model, Operational History.**

"Other than recent encounters with buried ACM and C&D debris in urban fill, no industrial activities or waste disposal operations are known to have occurred at Coddington Point, nor has a release of any other hazardous substance been reported in this area by the Navy."

As discussed below in specific comment #3, Nimitz Field was historically used as a rifle range. Therefore, please remove or revise this statement in this SAP.

2. p. 14, SAP Worksheet #10, Conceptual Site Model, Naval Supply School (Building 1112CP).

There is the potential for debris/contaminants in soil in this area to run off (e.g., via overland flow of stormwater) into the adjacent harbor. The ACM Report states on p. 17 that "NAVFAC NPT Environmental is alarmed by the close proximity of this site to a body of navigable water." Although RIDEM understands that the focus of this particular investigation is on impacts to soil, please discuss this potential migration pathway to some extent in this worksheet. Also, if contaminants above screening levels are found in this area, then please include an evaluation of surface soils on the harbor embankment adjacent to this area in subsequent investigations.

Page 23 of the Urban Fill Report identifies another C&D area in 1112CP approximately 150' north of boring SB-08; this area was noted as having visible concrete remnants, floor tiles and mastic present in soil (see Figure 6 of the Urban Fill Report). Please include the collection of soil samples from this area in this SAP.

3. p. 16, SAP Worksheet #10, Conceptual Site Model, Nimitz Field Lighting.

Please be advised that Coddington Point appears to contain an MMRP Site. Nimitz Field was historically used as a rifle range, as indicated in Section 4.12 of the Urban Fill report and historical drawings. Please add this past use to this section (page 16). The area of concern in this SAP comprises only a very small portion of the entire Nimitz Field; however, because of this area's history as a rifle range, there is the potential for lead to be present across a much larger area of the field than is proposed to be assessed. Please delineate the location of the former rifle range on a figure and propose a sampling scheme for this area in this SAP that includes all constituents typically found at a munitions site.

4. p. 21, SAP Worksheet #11, Project Quality Objectives/Systematic Planning Process, Step 2 – Study Goals, 2nd paragraph.

Please state in the text in this section that the Navy will discuss with the regulators where to place additional borings in this area based on the results of the GPR survey. Please replace "up to 4" with "additional".

5. p. 23, SAP Worksheet #11, Project Quality Objectives/Systematic Planning Process, Step 5, Analytical Approach, Goal 1 (1st Bullet).

Please describe in more detail what background dataset and screening criteria will be used in this comparison. Additionally, please describe how data comparisons will be made—for example, on a point-by-point basis, or area averaging?

6. p. 23, SAP Worksheet #11, Project Quality Objectives/Systematic Planning Process, Step 5, Analytical Approach, Goal 1.

Please add a bullet to this section which states that if visual observations made during soil sampling identify potential impacts from contaminants other than PCBs, lead, mercury or VOCs (i.e., TPH, SVOCs, other metals, etc.), the regulators shall be notified and a sample shall be taken for analysis, according to RIDEM's regulations.

7. p. 25, SAP Worksheet #11, Project Quality Objectives/Systematic Planning Process, Soil Sampling, Table 11-1.

- a. Please note that the RIDEM Remediation Regulations consider "surface" soil as soil located within 0-2' bgs, rather than the 0-1' interval specified in the SAP. Please consider enlarging the surface soil depth interval to 0-2', or collecting samples in the 1-2' range. (This change should be addressed in other relevant Worksheets throughout the document.)
- b. The Navy is only proposing to collect one 2-ft subsurface sample per boring (within the range of 1 to 10 ft bgs). RIDEM does not believe that one subsurface sample per boring is sufficient; therefore, please include an additional subsurface sample for each boring proposed in this SAP.
- c. Please adjust the Bishop's Rock target depth to 2-10' bgs due to the presence of the geotextile barrier and 2' clean soil cover in this area.

8. p. 33, SAP Worksheet #17, Sampling Design and Rationale, Soil Sampling.

Please note that the size of the sample aliquots should be determined based on visual observations, PID readings, etc. of the split spoon sample. Sample aliquots must be biased towards the portion of the split spoon that appears to be contaminated. If the split spoon appears to be homogeneous, then the sample aliquot may be taken along the entire length.

9. p. 34, SAP Worksheet #17, Sampling Design and Rationale, Soil Sampling.

The text states that soil samples will be collected and handled in accordance with SOP 3-21; however, SOP 3-21 is not included in Appendix A in this SAP - Resolution Consultants SOPs. Please provide SOP 3-21 in the response to comments and include it in the SAP.

10. p. 35, SAP Worksheet #14, Summary of Project Tasks, Drilling and Soil Sample Collection, 2nd paragraph.

Please remove "*and monitoring well*" from the 3rd sentence. There are no monitoring wells proposed in this SAP. Also please change "*Figures 3 and 4*" to "*Figures 4, 5 and 6*".

11. p. 39, SAP Worksheets #18, 19, 20, 30, Field Project Implementation.

Please change the holding time for PCBs from 0 to 40 days to analysis.

12. p. 40-41, SAP Worksheets #18, 19, 20, 30, Field Project Implementation.

The last four columns on the right side of this table are missing column titles-presumably, these columns are for the four analytes (lead, mercury, VOCs and PCBs). Please add column titles to this section of the table.

13. p. 43, SAP Worksheet #15, Reference Limits and Evaluation Tables.

- a. Please describe the selection process for Project Action Limits (PALs) in the notes. It appears that the PAL is the minimum between the EPA Regional Screening Value and the RIDEM Direct Exposure Criterion, but this is not stated in the SAP. Additionally, please specify the basis of the Project Quantitation Limit Goal.
- b. Note 1 on this table is missing the full Remediation Regulations reference. Please cite the full reference.
- c. Please incorporate RIDEM's Leachability Criteria in this worksheet for the selection of PALs. Please indicate in this SAP if Coddington Point is classified as a GA or GB area for groundwater by the State of RI.

14. Figure 3, Conceptual Site Model of Potential Exposure Pathways.

VOCs in soil may also volatilize to ambient air. Please add ambient air as a potential exposure medium to the figure.

15. Figure 4, Proposed Sample Locations, Naval Supply Corps (Building 1112CP), P451 New OTC Barracks, Combat Training Pool (Building 1357CP).

- a. As stated in specific comment #2, please include on this figure the C&D area located approximately 150' north of boring SB-08; this area was noted as having visible concrete remnants, floor tiles and mastic present in soil (see Figure 6 of the Urban Fill Report). Please include soil sample locations in this area on this figure. Also, please see general comment #5.
- b. Please include "(visual observations only)" next to "soil boring sampling – existing".

16. Figure 5. Proposed Sample Locations, Nimitz Field Lighting.

- a. Please label all historical soil borings on this figure.

b. Please include "(visual observations only)" next to "soil boring sampling – existing".

17. Figure 6, Proposed Sample Locations, Bishop's Rock.

a. Based on the estimated extent of demolition debris in the area of BR04 and BR05, please include one additional soil boring (BR06) near the southern edge of this area on this figure (as mentioned in general comment #5).

b. Please include "(visual observations only)" next to "soil boring sampling – existing".