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LETTER TRANSMITTING U S NAVY RESPONSES TO U S EPA REGION I AND RHODE  
ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT COMMENTS ON DRAFT  
SAMPLING AND ANALYSIS PLAN FOR CODDINGTON POINT BURIED DEBRIS AREAS OF  
CONCERN NS NEWPORT RI  
6/17/2013  
RESOLUTION CONSULTANTS

DATE: June 17, 2013  
TO: Distribution Listed Below  
FROM: Resolution Consultants  
RE: Response to Comments on Draft Sampling and Analysis Plan (SAP)  
Buried Debris Areas of Concern, Coddington Point,  
NAVSTA Newport, Rhode Island

On behalf of the Naval Facilities Engineering Command (NAVFAC), Mid-Atlantic, Resolution Consultants is providing you with the attached Response to Comment (RTC) package associated with the Draft Sampling and Analysis Plan (SAP). The SAP pertains to the planned Remedial Investigation (RI) for the Buried Debris Areas of Concern located at Coddington Point.

The intent of the RTC is to provide preliminary responses to the comments and to support a meeting with the regulatory agencies to develop a revised approach to the RI/FS work plan. The revised approach will be documented in a revised work plan (the Sample and Analysis Plan) for additional review and comments. The anticipated delivery of the revised work plan is August 8<sup>th</sup>, 2013.

In addition to the RTCs, included are an updated site plan that includes the extent of the prior GPR surveys and a summary table of buried debris area information.

The Navy Remedial Project Manager (RPM) and point-of-contact for this site is listed below:

Naval Facilities Engineering Command, Mid-Atlantic  
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The Navy believes that for this site, the next step to completing the work plan involved a collaborative meeting to discuss the approach details, followed by a revised plan. The weeks of June 17<sup>th</sup> and 24<sup>th</sup> are targets for this discussion.

Thank you again for your efforts in collaborating with the Navy to develop the SAP.

Sincerely,



Resolution Consultants

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Enclosures:

Response to Comments, June 2013  
Proposed revised work plan goals  
Site plan overview  
Summary table of areas of concern

**NAVY RESPONSES TO  
REGULATORY AGENCY COMMENTS  
DATED APRIL 9 (RIDEM) AND 10 (EPA), 2013  
ON THE DRAFT SAMPLING AND ANALYSIS PLAN,  
ACM AND BURIED DEBRIS AREAS, CODDINGTON POINT,  
NAVAL STATION (NAVSTA), NEWPORT, RHODE ISLAND  
(JUNE 2013)**

**EPA General Comments:**

***EPA General Comment 1:** The Draft SAP provides for an SI-level investigation of PCOCs. If Navy intends to conduct a phased effort for evaluation of the PCOC risks potentially co-located with the buried debris, the proposed sampling approach for the PCOCs in this Draft SAP may be adequate once revised...to adequately delineate the nature and extent of contamination and support RI-level investigation. Further, the adequacy of the proposed locations of the soil borings will need to be re-evaluated following Navy's responses to these comments in support of the "estimated extent of demolition debris" areas depicted on Figures 4, 5 and 6.*

**Response:** Comment acknowledged. The Navy agrees that if co-located constituents are identified during assessment, additional samples may be warranted for delineation purposes. A revised figure of sample locations and sample analysis table would be prepared for regulatory agency review prior to that additional effort.

In addition, the Navy has addressed the adequacy of proposed locations in other comment responses. It is recommended that the value of additional sample points be discussed with the regulatory agencies prior to the development of the revised work plan (see below).

***EPA General Comment 2:** During discussions on this Site held during the March 20, 2013 RPM meeting, Navy expressed its position that it intended to use the geophysical investigation and boring data to support delineation of the buried debris areas and...intends to use the boundaries for the buried debris disposal areas...as the boundaries for the asbestos-containing material (ACM) that will be subject to a response action due to potential asbestos exposure risk. ...if this approach is pursued, the Draft SAP will need to provide justification to support that ACM does not extend beyond the boundaries of the buried debris areas...and address any ACM that may be present in the soils outside the buried debris footprint (i.e., to address asbestos fibers that may have been mixed into soils during demolition where debris was disposed)*

**Response:** Comment acknowledged. The Navy plans to supplement existing information and data in both the work plan and in the future RI report to depict the boundaries of the debris areas. During the future process of remedial alternative evaluation and selection, the Navy acknowledges the need to accurately depict the boundaries that will ultimately be mitigated/remediated.

***EPA General Comment 3:** Another critical component for the RI Work Plan...is providing data and technical support that the ACM is only present in the subsurface and that the buried debris is adequately covered such that there is no risk from asbestos exposure. Ultimately, the*

*NESHAPs regulations will be an ARAR and the...Navy can potentially utilize geophysical data, boring data and observations, PCOC sampling/analytical data for surface soil, and/or asbestos sampling/analytical data for surface soil to support that the buried debris potentially mixed with ACM is covered with surface soil...If data is not adequate to support that ACM is not present in surface soils, activity-based sampling may be required.*

**Response:** Comment acknowledged. Based on recent construction activities (new construction at each area), there is a cover of clean soil at the surface within the buried debris areas. The work plan will be modified to include the verification of this information. There are also new building footprints and pavement in other portions. There has been no evidence of ACM in surface materials in these locations since construction activities have been completed (with the possible exception of the embankment at the MARDET building) [see related comments below on this].

For buried ACM waste disposal sites, NESHAP requires that no visible emissions be released to the air and must be covered by 6 inches of soil (40 CFR § 61.154). Discussion of the NESHAP regulations will be included in the RI/FS process.

***EPA General Comment 4:*** *The Revised Draft RI Work Plan must also address the “Draft Evaluation of Urban Fill Report” (January 2012), Section 6.2, item 3, which recommended “additional investigation of the MARDET Building #1112CP, specifically of the two six-inch diameter concrete remnants and the vegetated portion of the embankment.”*

**Response:** Agree. Navy will include as part of the work plan the task for preparing a field report of observations of the conditions of the embankment. Hand auger borings will be placed along the embankment to allow subsurface soil observations. An inspection for the existence of and condition of the remnants will take place. These tasks will be added to the work plan and discussed in the next RI work plan meeting proposed.

***EPA General Comment 5:*** *The current and foreseeable future use of the site and availability of, or limitations to, site access will also need to be considered in evaluating potential asbestos exposure risks. The Revised Draft RI Work Plan should include a discussion on current and future use and access for each of the disposal debris areas.*

**Response:** Agree. The plan for this area is to continue as part of the Navy’s education and training system. This includes classroom and field training and dormitory provisions. The discussion in the work plan will be enhanced to include additional details. These activities will also be included in the future development of the RI and FS.

### **EPA Specific Comments**

***EPA Specific Comment 1:*** *SAP Worksheet #10, Operational History, Naval Supply School (Building 1112CP), Page 14-15 and Figure 4: Additional information needs to be added to this section to clarify the historical findings that lead to the delineation of the “estimated extent of demolition debris”... What ACM is this referring to and what was the timeframe of the ACM abatement efforts... What is the “construction project” that is referenced...The 2011*

*investigation revealed the presence of debris but visual evidence did not indicate the presence of ACM...All of this historical information incorporated onto...Figure 4.*

**Response:** The text and Figure 4 will be revised to include additional details based on available information, to the extent possible. This figure will be reviewed at the next RI work plan meeting.

***EPA Specific Comments 2:** SAP Worksheet #10, Operational History, Combat Training Pool – Building 1357CP, Page 15 and Figure 4: Additional information needs to be added to this section to clarify the historical findings that lead to the delineation of the “estimated extent of demolition debris” depicted in Figure 4...*

**Response:** The text and Figure 4 will be revised to include additional details based on available information, to the extent possible. This figure will be reviewed at the next RI work plan meeting. In reference to the bottom of the reservoir, it is not believed that any ACM that might have been placed at the bottom of the tank would be available as a risk. The entire area of the former reservoir can be included in the assumed boundaries of buried debris in the development of the RI and FS.

***EPA Specific Comments 3:** SAP Worksheet #10, Operational History, P 451 New OTC Barracks, Page 15-16 and Figure 4: Additional information needs to be added to this section to clarify the historical findings that lead to the delineation of the “estimated extent of demolition debris”. A figure should be added...*

**Response:** The text and Figure 4 will be revised to include additional details based on available information, to the extent possible.

***EPA Specific Comment 4:** SAP Worksheet #10, Operational History, Nimitz Field Lighting, Page 16 and Figure 5: Additional information needs to be added to this section to clarify the historical findings that lead to the delineation of the “estimated extent of demolition debris”. A figure should be added...*

**Response:** The text and Figure 5 will be revised to include additional details based on available information, to the extent possible. This figure will be reviewed at the next RI work plan meeting.

***EPA Specific Comment 5:** SAP Worksheet #10, Operational History, Bishop’s Rock Improvement Project and Recreation Area, Page 16-17 and Figure 6: Additional information needs to be added to this section to clarify the historical findings that lead to the delineation of the “estimated extent of demolition debris”. A figure should be added...Navy must demonstrate whether all ACM risks within this area were addressed through the removal action. If ACM remains in this area and the cap is to address remaining risks from ACM exposure, the capped area will need to be incorporated into the response action.*

**Response:** The text and Figure 6 will be revised to include additional details to the extent possible. This figure will be reviewed at the next RI work plan meeting. Furthermore, the Navy

acknowledges the need to include the area as part of future response actions under the assumption that ACM may still exist below the surface. It is the intent of the Navy to address this as part of the RI/FS process. Note too that as part of the FS, it is likely that land use restrictions will be part of the alternatives considered and evaluated.

***EPA Specific Comment 6:*** *SAP Worksheet #11, Step 2 – Study Goals, Page 21: With respect to the “survey of Bishop’s Rock recreational area”...The SAP indicates that, if debris is located here, “up to 4 soil sample locations may be added for the collection of soil samples in the same manner as the other areas.” ...In addition, EPA cannot concur that 4 soil samples will be adequate to support even an SI-level investigation for PCOCs....*

**Response:** Agree. The Navy will revise the work plan text to indicate that, based on the results of the GPR survey, additional sampling needs will be proposed for regulatory agency review prior to implementation. If no debris is located with the GPR survey, further investigation will not be proposed.

***EPA Specific Comment 7:*** *SAP Worksheet #11, Step 5 – Analytical Approach, Page 23: The Draft SAP references that analytical results will be compared to “available background data (if any) and applicable screening criteria.” A table of background data and applicable screening criteria needs to be provided for EPA review...it is not clear that these are the screening criteria that will be used and background data are not included on this Worksheet.*

**Response:** Agree. The plan will be revised to clarify the screening criteria and PALs.

***EPA Specific Comment 8:*** *SAP Worksheet #17, Field Screening, Page 33: The Draft SAP includes a discussion on measurements in the breathing zone of field staff to be made to evaluate potential health risks. Will these measurements evaluate asbestos risks from the planned sampling activities? Provide details on this sampling program.*

**Response:** Air monitoring for VOCs is included for assessing soil samples and breathing zones of field staff. Asbestos-in-air is not proposed for this sampling effort as long as direct push soil sampling methods are used, soil samples remain wet, and asbestos is not observed.

***EPA Specific Comment 9:*** *SAP Worksheet #17, Soil Sampling, Page 33 and Figure 4: EPA requests additional sample locations be considered in the Navy Supply School area along the embankment (1-2 additional samples recommended), in the Combat Training Pool area to provide for adequate coverage (2-3 additional samples recommended), and in the New OTC Barracks area to provided for adequate coverage (2-3 additional samples recommended). See also General Comment 1.*

**Response:** Comment acknowledged. It is recommended that the value of additional sample points be discussed with the regulatory agencies prior to the development of the revised work plan.

**EPA Specific Comment 10:** *SAP Worksheet #17, Soil Sampling, Page 34: The Draft SAP references “SOP 3-21”. Please correct this reference to “SOP 3-17” if for Direct Push Sampling Techniques or include SOP 3-21 in the SAP.*

**Response:** Comment acknowledged. Revision will be made.

**EPA Specific Comment 11:** *SAP Worksheet #17, Geophysical Survey, Page 34: The Draft SAP should describe the EM and GPR capabilities and limitations for detecting buried debris, particularly considering EPA’s General Comment 2.*

**Response:** Agree. Additional information will be added as requested. A description of the survey limitations will be included as an appendix.

**EPA Specific Comment 12:** *SAP Worksheet #14, Subsurface Geophysical Survey, Page 35: Provide details on the grid spacing for the geophysical survey and clarify whether the entire area will be covered by the geophysical survey.*

**Response:** Agree. Additional information will be added as requested. For EM, 5-foot grid spacing will be used. A 10-foot grid spacing method will be used for GPR. The entire space shown on the plan is proposed for survey if this area remains included in the work.

**EPA Specific Comment 13:** *SAP Worksheet #14, Drilling and Soil Sample Collection, Page 35: Revise the term “BSG” to “BGS”. Delete the reference to “monitoring well locations”. Revise the reference to “Figures 3 and 4” to “Figures 4, 5 and 6”.*

**Response:** Agree. Revisions will be made as requested.

### **RIDEM General Comments**

**RIDEM’s 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 review this SAP to include further investigation of ACM at this Site.*

**Response:** Comment acknowledged. Additional historical information related to ACM will be added for clarification and, if deemed necessary, additional sample locations for ACM delineation will be included. Note too that Navy is also considering, as a conservative approach, that where ACM has been located in the subsurface within an area of debris, that area might pose a risk from asbestos and response actions will be evaluated as part of the RI/FS process.

**RIDEM’s General Comments 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.*

**Response:** Agree. The Figures will be revised to indicate the extent of ACM debris, removal and demolition activities to the extent possible.

***RIDEM's General Comments 3:*** Please note that all investigations and remedial actions conducted where asbestos is present must be conducted according to all applicable State regs.

**Response:** Comment acknowledged. Applicability of regulations will be addressed in the RI and FS reports.

***RIDEM's General Comments 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.

**Response:** Comment acknowledged. The use of test pits was initially considered. However, direct push probes are preferred for the following reasons: the EM/GPR surveys were used to locate debris and can be used for additional locating if needed, and opening test pits will possibly increase exposure risks to asbestos. Also note response below.

***RIDEM's General Comments 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.

**Response:** Comment acknowledged. It is recommended that the value of additional sample points will be discussed with the regulatory agencies prior to the development of the revised work plan. See also response to EPA specific comment # 9.

***RIDEM's Specific Comment 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.

**Response:** Comment acknowledged. Navy proposes to modify the text to include a reference to the rifle range.

***RIDEM's Specific Comment 2:*** p. 14, SAP Worksheet #10, Conceptual Site Model, Naval Supply School (Building 1112CP)...There is a potential for debris/contaminants in soil in this area to run off...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.*

**Response:** Comment acknowledged. Potential migration of constituents, if present, will be considered during the RI process. Also, the Navy will include a field report of observations of the conditions of the referenced embankment. Hand auger borings will be placed along the embankment to allow subsurface soil observations. An inspection for the existence of and condition of the remnants will take place.

***RIDEM's Specific Comment 3:*** *p. 16, SAP Worksheet #10, Conceptual Site Model, Nimitz Field Lighting. Please be advised that Coddington Point appears to contain an MMRP site...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...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.*

**Response:** It is recommended that the rifle range issue be considered separate from this plan. This area has not previously been identified as an MMRP site.

***RIDEM's Specific Comment 4:*** *p. 21, SAP Worksheet #11, Project Quality Objectives/Systematic Planning Process, Step 2-Study Goals, 2<sup>nd</sup> 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".*

**Response:** The Navy agrees to review the EM/GPR survey data with EPA and RIDEM and discuss additional assessment needs. The work plan text will be revised. See also EPA specific comment #6

***RIDEM's Specific Comment 5:*** *p. 23, SAP Worksheet #11, Project Quality Objectives/Systematic Planning Process, Step 5, Analytical Approach, goal 1 (1<sup>st</sup> 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?*

**Response:** Additional details on the PALs will be provided. Data will be compared on a point by point basis against the screening criteria. See also response to EPA specific comment #7.

***RIDEM's Specific Comment 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.*

**Response:** Agree. Note that based on a review of site history and prior discussions with the agencies, other constituents are not expected. However, the text will be modified to allow field flexibility. If other impacts are observed (oily soil; coal and ash, etc.), then additional samples will be collected for possible analyses. At a minimum, the observed location, depths and specific types of observations will be recorded in field sampling logs.

***RIDEM's Specific Comment 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 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.*

**Response:** The Navy acknowledges comment related to depth. For CERCLA sites and risk assessments, typically the range of 0 to 1 feet is used. For subsurface sample depth, because the subsurface consists of fill, and the debris does not appear to be deep, only one composite sample across the fill range was considered. If constituents are detected in the fill, then further delineation above or below the sample may be warranted. The adjustment to the Bishop's Rock area will be completed as requested.

***RIDEM's Specific Comment 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.*

**Response:** Agree. A clarification to the text will be made.

***RIDEM's Specific Comment 9:*** p. 24, 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.*

**Response:** Correction will be completed as noted.

**RIDEM's Specific Comment 10:** p. 35, SAP Worksheet #14, Summary of Project Tasks, Drilling and Soil Sample Collection, 2<sup>nd</sup> paragraph. Please remove "and monitoring well" from the 3<sup>rd</sup> sentence. There are no monitoring wells proposed in this SAP. Also please change "Figures 3 and 4" to "Figures 4, 5 and 6".

**Response:** Correction will be completed as noted.

**RIDEM's Specific Comment 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.

**Response:** Correction will be completed as noted.

**RIDEM's Specific Comment 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.

**Response:** A revision to the table will be made.

**RIDEM's Specific Comment 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...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.

**Response:** An adjustment to the PALs will be made to achieve the minimum of the EPA regional screening criteria, the RIDEM DEC, and the RIDEM leachability criteria (to be added). Note 1 will be modified as requested. Note that this is a GB area and this information will be added to the text.

**RIDEM's Specific Comment 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.

**Response:** Note that outdoor and indoor air matrices are already included as exposure media.

**RIDEM's Specific Comment 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”.*

**Response:** Agree. See response to EPA Specific Comment #2 related to the area north of SB-08. The figure will be updated as noted.

***RIDEM's Specific Comment 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”.*

**Response:** Update will be made.

***RIDEM's Specific Comment 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”.*

**Response:** Additional location will be added and figure will be updated as noted.

## **Draft revised work plan goals – Buried Debris Areas at Coddington Point Steps 2 and 5 of the DQO process**

### Step 2 - Study Goals

The specific study goals of the planned investigation are listed below.

- . Goal 1 - Evaluate the prior geophysical delineation of debris at each area using visual inspections of soil boring. Soil boring observations and documentation will focus on both the geospatial extent and the estimated depth of debris in each area.
- . Goal 2 - Identify the depth and suitability of soil cover on top of the debris in each area. Depth will be estimated by visual inspection for the absence of debris, or confirmed by prepared as-built construction reports.
- . Goal 3 - Characterize soil in the immediate vicinity of visual debris at each area. Laboratory analysis will include VOCs, total PCBs, lead, and mercury.

An additional effort will include the survey of the Bishop's Rock recreational area for subsurface anomalies, such as construction debris. If debris is located there, the assessment may include additional sampling. The boring locations would first be provided to the agencies for review and approval prior to data collection efforts.

### Step 5 - Analytical Approach

The analytic approach for the planned investigation is comprised of a series of "if, then" statements.

Goal 1 - Evaluate the prior geophysical delineation of debris at each area using visual inspections of soil boring.

- . If debris is present in a soil boring, the debris will be field characterized and debris type and soil type will be recorded.
- . Each soil boring location will be recorded using GPS and depths to sample locations and observations will be recorded.
- . If debris is absent in a soil boring, the boring will be considered a possible boundary of the debris area it is located near.

Goal 2 - Identify the depth and suitability of soil cover on top of the debris in each area.

- . If shallow soil (0 to 2 feet) in soil borings are free of debris, the soil will be considered clean fill for purposes of future evaluation of remedial alternatives.
- . If shallow soil in soil borings contain debris, locations may be considered for future sampling for debris and ACM assessment.

- . If construction records indicate that shallow soil consists of clean fill (or appropriate equivalent cover such as pavement or a building), the area represented by the records shall be considered covered for purposes of future evaluation of remedial alternatives.

Goal 3 - Characterize soil in the immediate vicinity of visual debris at each area.

- . If constituents are present in site-specific environmental media, then they will be compared to applicable screening criteria.

- . For constituents not detected using the laboratory detection limits presented, such analytes will be considered not present for purposes of this investigation.

- . If constituents are present in soil then their distribution will be used to assess the potential impact to soils and to evaluate additional investigation locations.

- . If visual observations made during soil sampling identify potential impacts (e.g., staining), then additional, deeper samples may be collected and analyzed to refine the vertical extent at that location.

- . If visual observations made during soil sampling identify debris, those locations will be recorded and documented as to types and depths of debris encountered.



**RESOLUTION CONSULTANTS**

Drawn: BC 5/9/2013  
 Approved: NT 5/9/2013  
 Project #: 60277548



**Legend**

- Debris Observed
- 2011 Soil Boring (Tetra Tech)
- 2009/2010 Soil Boring (Others)
- Former Water Storage Reservoir as Identified by Geophysical Survey
- Potential Buried Debris as Identified by Geophysical Survey (2009)
- 2009 Geophysical Survey Area
- 2011 Geophysical Survey Area
- Estimated Extent of Buried Debris (2011)

N

0 50 100 200 300 400

Feet

**FIGURE 2**  
**SITE OVERVIEW**  
 CODDINGTON POINT  
 NAVSTA NEWPORT, RHODE ISLAND

C:\Projects\NAVSTA Newport - Coddington Point\Map\SiteOverview.mxd

Coddington Point RI/FS - Buried Debris and Asbestos Sites and Other Areas of Concern  
Background information and proposed actions for ACM evaluation (May 2013)

Debris Location	Background and Initial Site Assessment Information
MARDET Bldg 1112CP	<ul style="list-style-type: none"> <li>• Former and current Naval classroom/school building; historically, area has undergone few changes other than filling of areas of the embankment adjacent to Coddington Cove</li> <li>• Classroom/school building underwent interior and exterior renovation</li> <li>• C&amp;D debris encountered during roadway and retaining wall improvements in December 2009</li> <li>• ACM and debris removed for construction access, but some ACM may remain in limits shown</li> <li>• Panels noted in 2011 report on sea-side slope, beyond retaining wall</li> <li>• 9 borings advanced during initial assessment</li> <li>• Debris identified in 2 borings – mostly under asphalt and greater than 2 ft bgs (1 foot in one boring)</li> <li>• No ACM observed in borings</li> <li>• The 2011 EM/GPR survey covered an area east and south of the building. Elevated responses were due to surface features and underground utilities, but buried debris areas were not identified.</li> </ul>
Combat Training Pool - Bldg 1357CP	<ul style="list-style-type: none"> <li>• Former barracks (Buildings 1120 and 1220) were constructed in 1942 and demolished between 1966 and 1973; at least part of a former underground water reservoir remains to the east of the new building.</li> <li>• Building areas were paved</li> <li>• Building 1357CP constructed in 2008</li> <li>• C&amp;D debris encountered with some ACM</li> <li>• ACM removed during construction activities where encountered, but intent was not to remove all ACM; disturbed area covered with clean fill</li> <li>• 14 borings advanced during initial assessment around new building</li> <li>• C&amp;D debris observed at four locations between 1 and 10 ft bgs</li> <li>• Two borings (SB-17 and SB-20) hit refusal at 5.5-6 feet on concrete, which is likely the former underground water reservoir.</li> <li>• No ACM observed in borings</li> </ul>

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	<ul style="list-style-type: none"> <li>• The 2011 EM/GPR survey covered an area surrounding the new building and identified the top of the former water storage structure on the east side of the building as an anomaly at a depth of 3-3.5 feet. Other elevated responses were due to surface feature and underground utilities, but buried debris areas were not identified.</li> </ul>
P451 New OTCN Barracks	<ul style="list-style-type: none"> <li>• Former barracks and other buildings demolished between 1966 and 1973 for parking lot and eventual new building construction (underway)</li> <li>• Buried C&amp;D debris with ACM observed in several test pits prior to building construction; geophysical survey of area also performed</li> <li>• Buried ACM initially discovered during trenching for electric power supply to site trailers</li> <li>• 25 borings advanced with ACM observed in 7 locations</li> <li>• C&amp;D observed within 2 ft bgs</li> <li>• Boring logs are not included in Urban Fill Evaluation report</li> <li>• 198 air (perimeter and personal) samples collected during construction efforts; 5 of the 198 samples had concentrations &gt;0.01 f/cc (RI clean air criteria) and none had &gt;0.1 f/cc (OSHA PEL)</li> </ul>
Nimitz Field Lighting	<ul style="list-style-type: none"> <li>• Location of former school and training buildings that were demolished in 1966 to 1973 and the field was created</li> <li>• Fragments of TSI and other ACM encountered in July 2010 during utility trenching for installation of field lighting and removed only as needed for construction access</li> <li>• 8 soil borings were advanced during initial assessment directly outside area where ACM previously encountered</li> <li>• Debris in one boring observed at 5-7 ft bgs</li> <li>• No ACM observed in borings</li> <li>• The 2011 EM/GPR survey covered an area between Elliot Ave and the west side of the track. Elevated metal responses were due to underground utilities and surface features (ex. light poles). GPR identified a possible bedrock surface and possible former groundwater with fill on top. No debris areas were identified.</li> </ul>

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Bishop's Rock Improvement Project	<ul style="list-style-type: none"><li>• Former rock island connected by man-made earthen/rock causeway</li><li>• Soil excavated from causeway and pavilion area during construction; where ACM was observed, removed as ACM-containing soils</li><li>• Test pits dug on causeway revealed additional building rubble and ACM</li><li>• Debris encountered in 6 of 12 borings and potential ACM observed in two locations during initial assessment</li><li>• Area of observed ACM covered with geotextile fabric and 1 foot soil as part of current improvement project</li><li>• The 2011 EM/GPR survey covered the causeway and portion of Bishop's Rock. Four areas of potential demo debris were identified along the southern side of the causeway and a sewer main was identified in the center of the causeway.</li></ul>