

N62661.AR.003121
NS NEWPORT
5090.3a

LETTER AND COMMENTS FROM RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL
MANAGEMENT REGARDING DRAFT SITE INVESTIGATION REPORT DEFENSE HIGHWAY
PIPELINE CHAMBER INVESTIGATION NS NEWPORT RI
1/10/2014
RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT



RHODE ISLAND

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

10 January 2014

James M. Tarr, CPG, CG
Remedial Project Manager
NAVFAC MIDLANT, Code OPT3-5
9742 Maryland Avenue, Bldg Z-144
Norfolk, VA 23511-3095

RE Draft Site Investigation Report, Defense Highway Pipeline Chamber Investigation
Naval Station Newport, Rhode Island

Dear Mr. Tarr,

The Office of Waste Management at the Rhode Island Department of Environmental Management (RIDEM) has reviewed the *Draft Site Investigation Report, Defense Highway Pipeline Chamber Investigation* dated 22 November 2013 for the Naval Station Newport, RI. As a result of this review, this Office has generated the attached written comments on the *Draft Site Investigation Report, Defense Highway Pipeline Chamber Investigation*.

This Office looks forward to working with the Navy in the remediation and final close out of this Site. If the Navy has any questions or requires additional information please call me at (401) 222-2797 ext.7148.

Sincerely,

Gary Jablonski, Principal Engineer
Office of Waste Management

cc Matthew DeStefano, RIDEM
Richard Gottlieb, RIDEM
Darlene Ward, NETC, Newport, RI
Naomi Ouellette, Resolution

RIDEM's Comments on the
Draft Site Investigation Report, Defense Highway Pipeline Chamber Investigation
Naval Station Newport

Specific Comments:

- 1. Page 20, Section 6.2 Test Pit Excavation and Monitoring Well Installation: 1st paragraph 2nd sentence.**

"During test pitting activities, LNAPL was observed at chambers A16 and E22."

Please be advised that under Section 8.07(A) Upper Concentration Limits of this Office's Remediation Regulations, "*The presence of NAPL in any environmental medium shall be considered a condition that exceeds Upper Concentration Limits*". Please be advised that this Office considers these two chambers out of compliance with this Office's Remediation Regulations and further investigations will be needed at these two chambers to find the extent and nature of the NAPL.

- 2. Page 21, Section 6.3 Well Development: 1st paragraph, 5th sentence.**

"LNAPL globules were observed in the temporary well installed at E22."

Please be advised that under Section 8.07(A) Upper Concentration Limits of this Office's Remediation Regulations and Rule 11 Groundwater Quality Standards and Preventative Action Limits of RIDEM's Groundwater Quality Rules, Chamber E22 is out of compliance and further investigations will be needed to find the extent and nature of the NAPL present at this chamber.

- 3. Page 41, Section 8.1.1 LNAPL; entire section.**

Please refer to Comments 1 & 2 mentioned above.

- 4. Page 42, Section 8.1.2 Soil Impacts; Chamber A16 and Chamber E22.**

"Oil was observed at this location seeping from the concrete vault once it was exposed."

Please refer to Comment 1 mentioned above.

- 5. Page 51, Section 11.1 Summary of Findings; 2nd bullet.**

"A small amount of LNAPL was observed at chambers A16 and E22."

Please refer to Comments 1 & 2 mentioned above.

RIDEM's Comments on the
Draft Site Investigation Report, Defense Highway Pipeline Chamber Investigation
Naval Station Newport

6. Page 51, Section 11.2 Recommendations; 1st bullet.

“No further assessment or evaluation of remedial alternatives is warranted at 10 of the 11 chambers assessed (A4... A16, E22...)”

Please refer to Comments 1 & 2 mentioned above.