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LETTER AND COMMENTS FROM RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL
MANAGEMENT REGARDING DRAFT SAMPLING AND ANALYSIS PLAN ADDENDUM SITE 4
CODDINGTON COVE RUBBLE FILL AREA NS NEWPORT RI

6/27/2013

RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

27 June 2013

Maritza Montegross
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) Addendum
Site 04 - Coddington Cove Rubble Fill Area
Naval Station Newport, RI

Dear Ms. Montegross,

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) Addendum*, dated May 2013 for the Coddington Cove Rubble Fill Area, Naval Station Newport, located in Newport and Middletown, RI. As a result of this review, this Office has generated the attached comments on the *Draft SAP Addendum*.

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, RIDEM
Richard Gottlieb, RIDEM
Gary Jablonski, RIDEM
Darlene Ward, NSN
Ginny Lombardo, EPA Region I
Melissa Cannon, Resolution
Lisa McIntosh, W&C
Crista Trapp, W&C

**RIDEM Comments (6/27/13) on the
Draft Sampling and Analysis Plan (SAP) Addendum
Site 04 - Coddington Cove Rubble Fill (CCRF) Area
Naval Station Newport, RI**

General Comments:

1. Please include in this SAP Addendum a discussion of the previous groundwater data for arsenic, chromium, cobalt, iron and manganese, and include a summary of this data on a figure.

Specific Comments:

1. **SAP Worksheet #11, Step 5 – Analytical Approach; 1st bullet.**

“If the concentrations of the five metals of primary interest (As, Cr, Co, Fe and Mn) in site groundwater are shown to be consistent with upgradient groundwater, then these metals may be considered to be consistent with local background conditions.”

The Navy is only proposing to install one upgradient monitoring well, to be located adjacent to the site on the other side of Coddington Highway. In order to state with reasonable certainty that concentrations on the site are consistent with local background conditions, several upgradient monitoring wells should be installed to provide a better representation of upgradient groundwater concentrations. Please revise this SAP to include one or two additional upgradient monitoring wells. Please review historic aerial photos, figures, etc. to ensure that the locations of the upgradient wells have not been impacted by potential former Navy releases.

2. **SAP Worksheet #15, Table 15-1, Project Action Limits (PALs) – Groundwater.**

Please update the sources for the project action limits (PALs) and include PALs for nitrate and nitrite. Specifically, the USEPA Regional Screening Levels (RSLs) were updated in November 2012. Also, please clarify in the footnotes that the RSLs for cobalt, iron, and manganese are adjusted to represent a hazard quotient of 0.1.

There are Federal Maximum Contaminant Levels (MCLs) available for nitrate (10 mg/L) and nitrite (1 mg/L). Please include these as PALs.