



DIVISION OF SITE REMEDIATION Formerly the
STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

DIVISION OF AIR AND HAZARDOUS MATERIALS
291 Promenade Street
Providence, R.I. 02908-5767

7 June 1993

Mary Sanderson, Chief
Federal Facilities
U.S. Environmental Protection Agency
Region I
J.F. Kennedy Federal Building
Boston, Massachusetts 02203-2211

RE: McAllister Point Landfill, Naval Education Training Center, Newport, RI

Dear Ms. Sanderson:

As the EPA moves towards selecting a remedy for the McAllister Point Landfill, I am growing concerned that the State's outstanding unresolved issues will not be properly addressed. Division personnel have communicated these issues on several occasions through correspondence, meetings, and telephone conversation. To date, our concerns remain unresolved. Please find the issues we believe to be outstanding attached.

The State believes that it has engaged the Navy and EPA in informal Dispute Resolution through meetings and correspondences between Project Managers and Site Supervisors. Since the Parties have met several times to discuss and attempt resolution of the dispute without success, the State is considering invoking Formal Dispute Resolution measures as agreed upon in the Federal Facility Agreement (FFA).

I feel that it would be in the best interest of the project to schedule one final meeting in order to attempt to resolve the outstanding issues. Hopefully, such a meeting would serve to make Formal Dispute Resolution invocation unnecessary. Please contact me or Greg Fine at (401) 277-2797 if you are interested in arranging a meeting.

Sincerely,

Warren S. Angell II, Acting Supervising Engineer
Division of Site Remediation

cc. Greg S. Fine, DEM/DSR
Terrence Gray, Chief DEM/DSR
Claude Cote, DEM legal
Al Haring, USDoN

New General Comment (2)

The Navy has proposed limiting the number of surface soil samples taken at the McAllister Point Landfill site. The State concurs with this proposal. The State recommends additional borings across the site in lieu of the surface soil samples. These additional borings would be necessary in order to fully characterize the site and locate potential hot zones which require remediation.

Note: The Navy is reluctant to agree to substituting surface soil samples with subsurface explorations. The State requires additional borings in order to better characterize the subsurface conditions at the site.

The State requests information pertaining to the locations of proposed geotechnical borings. The State feels that these borings may be used to satisfy RI concerns as well as geophysical investigations. On 18 March 1993, the Navy verbally agreed to submit samples collected from these borings for analysis if they meet the agreed upon criteria (this criteria has yet to be established).

21. Volume III-1, Page 14: Section 3.4, Paragraph 2

"As is necessary, additional soil gas survey points will be completed around points indicating elevated concentration of soil gas to locate "hot spots"."

A soil gas survey over the entire site would optimize the location of proposed monitoring wells and borings and identify "hot spots" in areas away from MW 3 and MW 5.

DEM RESPONSE: *In order to optimize the location of the proposed borings and monitoring wells the State requests that a soil gas survey be conducted over the entire site. This survey would also be instrumental in the location of isolated hot spots which would require remediation.*

Note: The Navy refuses to perform a soil gas survey over the entire site.

The State is willing to consider limiting the soil gas survey to areas in the vicinity of borings 3 and 7, in addition to the proposed soil gas surveys (Final Report, March 1993) around monitoring wells 3 and 5. The State requests this additional soil gas survey in order to gain information which will aid in the optimum placement of additional borings.

35. **Volume III-2, TABLE 4: Site 09 - Old Fire Fighting Training Area Monitoring Well Location/Rationale.**

"MW-6S/R Further investigate groundwater quality upgradient (south) of Site 09."

During Phase I investigations VOCs and SVOCs were not detected in Phase I upgradient well MW-5. The concentration of the majority of the heavy metals observed in this well were below that detected in the downgradient monitoring wells.

Therefore it is assumed that the justification for an additional upgradient well MW-6S/R is the elevated levels of SVOCs observed in the soil borings for this well. If this is the case, the report should clearly note this in the rationale section. In addition the report should note if an upgradient source of contamination is suspected or whether the observed levels found in the soil boring for MW-5 are due to activities carried out during the operation of and or dismantling of the fire fighting station.

The State recommends addressing potential upgradient contamination by conducting a limited soil gas survey or obtaining grid water samples upgradient of the site with a geoprobe.

DEM RESPONSE: *The State has asked the Navy to speculate concerning the source of the upgradient contamination (ie, underground pipeline tank, activities associated with the firefighting training area). The Public Works department of the Navy should have the appropriate maps depicting the locations of various utilities and storage areas. A metal detector may be employed to locate rectangular metal tanks.*

Finally, the report should elaborate as to how a soil gas survey conducted on the southern edge of the site will aid in the placement of a monitoring well in an area of contamination approximately 160 feet south of the soil gas survey area.

Note: The Navy refuses to perform a soil gas survey to determine well placement. The Navy is unwilling to speculate in the report as to the source of upgradient contamination.

42. **Volume III-3, Page 4:
Section 3.2.2, Paragraph 5**

"Soil samples will be collected from the Phase II site well borings planned at eight different on-site locations."

In the Phase I investigation elevated soil gas readings were obtained in the vicinity of a number of the underground storage tanks. The State recommends collecting soil or groundwater samples from the ring drains of these tanks. A geoprobe could be used for this investigation.

DEM RESPONSE: *During Phase I activities, monitoring wells were placed in three different locations in the main body of the tank Farm (MW 3S3D in the central portion of the site, MW 1S1D in the central western portion of the site and MW-2 in the central western portion of the site). In addition, the MW are not downgradient of all of the tanks. Phase II Monitoring wells will be downgradient of all of the tanks. However, some of the MW will be located at a maximum of 1250 feet downgradient of the tanks. Borings were not carried out at the site. The State does not feel that information from these three monitoring well locations and the proposed Phase II locations will substitute for investigation of the rings drains (ring drains are design to capture contaminates from the tanks). Therefore, at a minimum the State suggest sampling the final collection point for the ring drain system.*

Note: The Navy wants to address this during tank closure.

43. Volume III-3, Page 4
Section 3.2.2, Paragraph 5

"Soil samples will be collected from the Phase II site well borings planned at eight different on-site locations."

Section 2.2 Site History section of this reports notes that approximately 100,000-190,000 gallons of oils sludge obtained during the cleaning of the tanks was deposited in the vicinity of the tanks. The report has not indicated which sampling activities are designed to located these sludge disposal areas. The State recommends a limited survey in the vicinity of the tanks. This survey may involve the field examination of soil samples collected with a hand auger or microwell and or the collection of near surface soil gas samples in the vicinity of the tanks.

DEM RESPONSE: *The criteria employed to locate sludge disposal areas, (Visual evidence, aerial photographs etc.) were not effective for Tanks Farms 1,2 and 3, where there is documented evidence of sludge disposal. In addition, groundwater investigations to date are not sufficient to characterize the site. Therefore, at a minimum the State feels that the area in the immediate vicinity of the tanks should be investigated (especially those areas on the same side as the pumphouse). This investigation may entail a limited soil gas survey of the areas, or soil borings and headspace analysis and visual inspection of the cores.*

Note: Previously, the Navy was unwilling to perform the soil gas survey or the headspace analysis. The Navy feels that the discovery of BSW lines (thought to be an acronym for Bottom Sludge and Water lines) disproves the existence of sludge disposal areas.

During the 8 April 1993 meeting, the Navy verbally agreed to submit a modified Scope of Work which would outline a limited subsurface investigation in the areas in the immediate vicinity of the tanks. The State has yet to receive this document.

**45. Volume III-3, Page 15:
Section 3.4, Paragraph 6**

"In Phase II, a total of thirteen monitoring wells are planned at nine new locations."

During the Phase I soil gas investigation elevated readings were obtained throughout the site including the perimeter of the site. However the grid size employed during the soil gas survey did not allow for delineation of plumes or zones of contamination. The elevated soil gas readings should be addressed during the Phase II investigations. The State recommends the collection of groundwater samples and or soil gas with a geoprobe in order to investigate possible offsite contamination and to optimize the location of onsite sampling points.

DEM RESPONSE: *The State agrees with the Navy contention that the Phase I monitoring wells have not adequately characterize the site. Therefore the State feels that the Phase I soil gas survey and the results from the sludge disposal area investigations should be used to optimize the location of the Phase II monitoring wells.*

Note: The Navy feels that the discovery of BSW lines from the tanks at the tank farms disproves the existence of sludge disposal areas. The State does not share this position. The Navy refuses to perform a soil gas survey adjacent to the tanks.

**47. Volume III-3, Page 17:
Section 3.6, Paragraph 1**

"The ruins appears to be a former oil/water separator or similar structure."

The report should include a diagram depicting the piping network associated with the oil/water separator including the discharge point for said system. In possible a sample should be collected from this network. In addition the report should include a diagram depicting the fuel line piping network.

DEM RESPONSE: *During remedial activities carried out at this structure, the Navy should determine whether the line (if it exists) entering the structure is charged with oil. A metal detector may be employed to determine if this structure is connected to the oil water separator, etc.*

Note: The Navy wants to address this during tank closure.

70. **Appendix B, Page 13:
Section 6.2, Paragraph 3**

"Split spoon samples will be monitored for the presence of total VOC vapors with a flame or photoionization detector."

The report should elaborate on the procedure to be employed to detect VOCs in the split spoon samples (ie, samples placed in jars for headspace analysis, etc).

DEM RESPONSE: *The State feels that head space readings obtained from jars should be part of the screening procedure for the soil samples.*

Note: The Navy refuses to perform headspace analysis.

77. **Appendix B, Page 18:
Section 7.5, Paragraph 2**

"Additionally, at those sites where the presence of a non-aqueous phase liquid (NAPL) is anticipated due to previous site information or as potentially indicated by test or monitoring well boring observation, the presence of NAPLs will be assessed (e.g. the thickness of the NAPL will be determined) prior to sampling with an oil/water interface probe."

The Division recommends the following:

Prior to taking water level measurements a head space readings should be collected and recorded for each well using a Hnu or an OVA.

An oil/water interface probe should be used at all well independent of site history. The use of an oil/water interface probe in lieu of an electronic water sensing device will not generate any appreciable delays or cost in sampling the wells.

NAPLs detected in the wells should be sampled prior to well purging.

DEM RESPONSE: *The State feels that Oil/Water interface probes should be used at all wells prior to purging to test for LNAPLS and DNAPL. Given the nature of the contaminants deposited at the site it is not unreasonable to test for NAPLs. In addition, most sampling protocols hierarchy specify "clean wells" to "dirty wells" thereby eliminating concerns of cross contamination. If the Navy is not confident with the decontamination procedures employed at the site multiple probes may be used.*

Note: The Navy refuses to use oil/water interface probes to test for LNAPLs and DNAPLs at all wells.