



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

14 June 2010

Winoma Johnson, P.E.
NAVFAC MIDLANT (Code OPNEEV)
Environmental Restoration
Building Z 144, Room 109
9742 Maryland Avenue
Norfolk, VA 23511-3095

RE: Draft Sampling and Analysis Plan, Study Area Screening Evaluation,
Codington Cove Rubble Fill Area, Naval Station Newport, RI

Dear Ms. Johnson:

The Office of Waste Management at the Rhode Island Department of Environmental Management has conducted a review of the *Draft Sampling and Analysis Plan, Study Area Screening Evaluation* dated April 2010 for Site 04, Codington Cove Rubble Fill Area, Naval Station Newport, located in Newport, Rhode Island. As a result of this review, this Office has generated the attached comments on the *Draft Work Plan Addendum Supplemental Remedial Investigation Draft Sampling and Analysis Plan, Study Area Screening Evaluation*.

If you have any questions, in regards to this letter, please contact me at (401) 222-2797, extension 7148 or by e-mail at gary.jablonski@dem.ri.gov.

Sincerely,

Handwritten signature of Gary Jablonski.

Gary Jablonski, Principal Engineer
Office of Waste Management

cc: Matthew DeStefano, RIDEM
Richard Gottlieb, RIDEM
Ginny Lombardo, USEPA Region I
Cornelia Mueller, NETC, Newport, RI
Stephen Parker, Tetra Tech

SASE comltr 061410

**Draft Sampling and Analysis Plan
Study Area Screening Evaluation
Codrington Cove Rubble Fill Area**

Naval Station Newport

Dated April 2010



Office of Waste Management's Comments:

1. Page 32, Section 10.5, Conceptual Site Model and Figure 10-3; whole section.

Please update Figure 10-3 or the text in this section to include the following considerations to the Potential Exposure Pathways and Receptors: Residential ingestion and dermal contact of surface and subsurface soils, as well as inhalation of subsurface soils and groundwater; The onsite construction worker should include exposure to sediments and surface water via ingestion, dermal contact, and inhalation; The industrial scenario should include inhalation of surface/subsurface soils, groundwater, and dermal contact with sediments and surface water; In regards to the ecological risk assessments please include ingestion of sediments and dermal contact with subsurface soils.

2. Page 34, Section 1.2 Inputs to the Decision; 2nd paragraph.

Since TPH was detected above regulatory criteria in soil samples collected at the site in the past and TPH analysis was discussed on page 27 of this report, please add TPH analysis to the groundwater analytical groups.

3. Page 35, Section 1.2 Inputs to the Decision; 2nd paragraph.

Since TPH was detected above regulatory criteria in soil samples collected at the site in the past and TPH analysis was discussed on page 27 of this report, please add TPH analysis to the proposed soil analytical groups.

4. Page 35, Section 1.2 Inputs to the Decision; 2nd paragraph.

Soil results should also be compared to RIDEM's Residential Direct Exposure and Leachability Criteria. Please add the appropriate language to this section.

5. Page 35, Section 1.2 Inputs to the Decision; 4th paragraph.

"The ecological risk criteria for sediments are selected in the following order of preference"

Typically the most conservative benchmark, criteria, or guideline is employed. Please modify the report to include this stipulation.

6. Page 36, Section 11.3, Boundaries of the Study; 2nd paragraph, 2nd sentence.

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"To adequately investigate this population, overburden monitoring wells, must be screened across the water table, where light non-aqueous phase organic chemicals may accumulate."

The typical selection of well screens for monitoring wells in this Office is based upon results of historical investigations and actual field work screening (head space, discolored split spoon sample, water sample results, etc...). Please change the text to reflect that well screen locations will be determined by the use of field screening and historical data.

7. Page 37, Section 11.4 Analytic Approach; number 2, 2nd sentence.

"The SLERA will consist of Steps 1, 2, and 3a of the eight steps in accordance with the guidance documents (EPA, 1997, EPA, 1998, and DON, 1999)."

Since this report will be part of the administrative record that the general public is able to access and review, please provide in this section of the report or in the appendices the written Steps 1, 2, and 3a that will be used.

8. Page 42, Section 14.1.2, Test Pit Excavation and Sampling; whole section.

As per the aerial photographs presented by RIDEM during the 20 January 2010 RPM meeting, the wetland area on the western end of the Site appeared to be historically disturbed. Please include in this section and in the Tables and Figures a sufficient amount of test pits or other field investigation activities (i.e. borings, geoprobe borings, metal detector, etc...) to properly investigate this historical disturbed area.

9. Page 42, Section 14.1.2, Test Pit Excavation and Sampling; 4th sentence.

"Samples will be evaluated for total VOCs via headspace analysis and then containerized for laboratory analysis."

Due to VOC loss during the performance of the onsite headspace analysis, the actual headspace sample should not be sent to the laboratory. Please add language to the text that a separate sample from this location will be properly preserved and sent to the laboratory for VOC sampling.

10. Page 43, Section 14.1.3, Drilling and Soil Sampling; 3rd paragraph, 3rd sentence.

"Soil samples for laboratory analysis will be collected from the following depths: 0 to 1 foot interval;"

In accordance to RIDEM's Remediation Regulations the soil sample should be collected in the 0-2 foot interval. Please modify the text in this section and throughout the report to reflect this.

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11. Page 43, Section 14.1.3, Drilling and Soil Sampling; 3rd paragraph, 3rd sentence.

"Soil samples for laboratory analysis will be collected from the following depths; and two intermediate intervals, to be selected by the project geologist,"

Please add the following text to the above sentence: *"two intermediate intervals, which exhibit field evidence of contamination, to .."*

12. Page 43, Section 14.1.3, Drilling and Soil Sampling; 4th paragraph, 1st sentence.

"Jar-headspace screening for total VOCs will be conducted for each soil interval in order to identify boring intervals containing contamination."

Please refer to Comment 9, mentioned above.

13. Page 43, Section 14.1.4 Monitoring Well Installation and Development; 2nd paragraph, 3rd sentence.

"Wells screened in the shallow overburden will have 10-foot screens which will be installed to intersect the average estimated water table at each location, with the bottom of the screen approximately 5 feet below the water table"

In order to avoid the well being dry and no groundwater sample can be collected in the future, please change the language above to have the bottom of the screen approximately 8 feet below the water table.

14. Page 44, Section 14.1.6, Surface Water and Sediment Sampling and page 83, Table 17-3 Summary of Proposed Sediment and Surface Water Samples

Sample SD06/SW06 is labeled as an up gradient sample at the outfall from the storm water outfall. It is not known whether the wetlands at the Site are tidally influenced. Further, the outfall pipe is located close to the area of active dumping. Please modify the text in this section and in the Table to stipulate that the sample will be taken immediately adjacent to the pipe.