



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I  
JOHN F. KENNEDY FEDERAL BUILDING  
BOSTON, MASSACHUSETTS 02203-0001

June 4, 1997

James Shafer, Remedial Project Manager  
U.S. Department of the Navy  
Naval Facilities Engineering Command  
Northern Division  
10 Industrial Highway  
Code 1823, Mail Stop 82  
Lester, PA 19113-2090

Re. Work Plan for Source Removal Evaluation, Old Fire Fighting Training Area - Naval Education and Training Center, Newport, Rhode Island

Dear Mr Shafer

Thank you for the opportunity to review the *Work Plan for Source Removal Evaluation, Old Fire Fighting Training Area* at the Naval Education and Training Center in Newport, Rhode Island dated May 1997. EPA evaluated the Work Plan for technical adequacy, adherence to EPA guidance and generally accepted practice. The Work Plan was also evaluated to ensure that areas of contamination that were identified in the Remedial Investigation were addressed. The *Draft Final, Volumes I and II (Human Health Risk Assessment Report), Old Fire Fighting Training Area Remedial Investigation Report: Technical Report and Appendices A-F* dated August 1994 and the *Draft Final Ecological Risk Assessment Report, Old Fire Fighting Training Area Remedial Investigation Report: Technical Report and Appendices A-E* dated October 1994 were used for this review. Detailed comments are provided in Attachment A.

I look forward to working with you and the Rhode Island Department of Environmental Management toward the cleanup of . Please do not hesitate to contact me at (617) 573-5777 should you have any questions or wish to arrange a meeting.

Sincerely,

A handwritten signature in black ink, appearing to read "Kimberlee Keckler".

Kimberlee Keckler, Remedial Project Manager  
Federal Facilities Superfund Section

Attachment

cc Paul Kulpa, RIDEM, Providence, RI  
Brad Wheeler, NETC, Newport, RI  
Susan Svirsky, USEPA, Boston, MA



Jennifer Hayes, Gannet Fleming, Harrisburg, PA  
Ken Finkelstein, NOAA, Boston, MA  
Steven Parker, Brown & Root, Wilmington, MA

## ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p 1-1, §1.1	The overall purpose of this work plan is to identify specific source areas, and determine the need for removal actions. The overall sampling plan for monitoring well, sediment, and subsurface soil samples appears to be adequate to accomplish this objective. However, the results of the proposed trenching may reveal additional sources that may require further characterization. The work plan should discuss the need for further characterization of site media if additional sources are discovered.
pp 2-8 & 2-9, §2.4	This section discusses the need for additional sampling to evaluate sources of potential concern. There currently is no discussion in the text of the forthcoming Marine Ecological Risk Assessment for the area off shore of the OFFTA. The results of this ERA may also demonstrate the need for further site characterization or remediation. Therefore, this section should indicate that results of the ERA, as well as the results of this Source Removal Evaluation, will be considered when deciding whether further remedial action is warranted at the OFFTA.
p 3-8, §3.4.2	Sediment samples will only be analyzed for TCL SVOCs. However, PCBs were detected in sediment samples during the RI. Therefore, sediments should also be analyzed for PCBs in addition to TCL SVOCs.
p 3-8, §3.4.3	The water source used for drilling, monitoring well installation, and well development should be analyzed for TCL organics and TAL inorganics to determine if any contaminants exist.
pp 3-8 to 3-14, §3.4.3	<p>It is unclear from the text how many soil borings and monitoring wells will be installed. Page 3-8 states that only one soil boring and one monitoring well will be installed. However, page 3-12 states that three borings will be advanced. The text throughout the section should be revised to consistently note how many borings and monitoring wells will be installed.</p> <p>In addition, it is unclear how the locations for the boring(s) and monitoring well(s) will be chosen. The text only states that one monitoring well will be located downgradient of an identified source. The text should clarify which parameters will influence the location of the monitoring wells. For instance, the boring and monitoring well will be located downgradient of the source area determined to have the highest contamination during trenching. I recommend that the area of highest contamination be</p>

determined based on sample results in addition to visual observations and FID readings.

- p 3-10, §3.4 3      The text states that any borings advanced into bedrock will be backfilled with bentonite chips and sand before constructing an overburden well. I recommend that the boring be backfilled with bentonite grout (not bentonite pellets and sand) to prevent any possible migration of contaminants
- p. 3-12, ¶3      The text states that the bentonite pellet seal will be approximately 1.5 feet thick. However, Figure 3-2 identifies a minimum bentonite seal of 2.0 feet. A minimum bentonite seal thickness of 2.0 feet is recommended where feasible. Please clarify.
- p. 3-12, ¶4      The text states that for a bedrock monitoring well, the riser space above the sand pack will be filled with bentonite grout. However, Figure 3-3 details a PVC/Teflon ring, bentonite seal, and then the bentonite grout. A PVC/Teflon ring, and bentonite seal should be used in addition to the bentonite grout. Please clarify
- p 3-18, §3.4 5      The purpose of this task is to identify whether PAH contamination detected in the storm sewer outfall during the RI is attributable to the storm sewer or tidal action. However, the only sampling proposed is at the outfall of the sewer pipe, which will only give the same result obtained during the RI. If possible, upstream manholes should be located and sediment samples should be collected within these manholes to delineate the flow coming from the sewer system
- p 3-20, ¶1      The text should be revised to state that metal debris will be decontaminated before disposal
- Table 3-1      Table 3-1 indicates that the “estimated number of samples” to be taken includes field QA/QC samples. However, the table does not indicate that types of field QA/QC samples to be taken. Since the different parameters and methods do not require the same types of field QA/QC samples, the table should be expanded to include the types and numbers of QA/QC samples to be taken for each parameter
- Table 3-1      Table 3-1 references “CLP SOW ILM03 0, w/rev” for Total TAL Metals and for TCLP Metals analyses. The reference for the most recent Statement of Work for Inorganic Analytical Service is “CLP SOW ILM04, w/rev ” Please correct the reference in the table unless the older ILM03.0 revision of the SOW will be used for this site

- Table 3-1 Table 3-1 references “CLP SOW OLM03.0, w/rev ” for TCL VOCs for both soil and groundwater samples. VOC analyses for groundwater should be performed utilizing the CLP SOW for Low Concentration Organic Analytical Service (Water Matrix), OLC02.1 The water samples from the Outfall Pipe Sampling could be performed using either SOW. However, OLC02.1 is preferred for comparison of groundwater data to drinking water standards.
- Table 3-2 Table 3-2 indicates that one 1-liter amber bottle will be used for TCL SVOC analysis for all types of water samples to be collected at the site. However, the entire liter is consumed in a single extraction and analyses. Therefore, each sample should be collected with double volume to allow for quality control analyses in the laboratory or possible reextraction, if necessary.
- Table 3-2 Table 3-2 indicates that one 1-liter amber bottle will be used for TCL Pesticide/PCB analysis for all types of water samples to be collected at the site. However, the entire liter is consumed in a single extraction and analyses. Therefore, each sample should be collected with double volume to allow for quality control analyses in the laboratory or possible reextraction, if necessary.
- Table 3-2 Table 3-2 indicates that dissolved TAL Metals analyses are to be performed on filtered groundwater samples I recommend that the table clarify that samples must be filtered before preservation with nitric acid.
- Table 3-2 Table 3-2 indicates that water samples for TPH analysis are to be collected in a 25- ml plastic bottle and that a minimum volume of 50 ml is necessary. However, EPA Method 418.1 requires that a representative sample of 1-liter volume be collected in a glass bottle The entire 1-liter sample is consumed by the test, so it is recommended that the sample be collected with double volume (e.g., a total volume of 2 liters) to allow for quality control analyses in the laboratory
- Table 3-3 Field blanks are not identified as a field quality control sample. Field blanks should be collected for each matrix at a frequency of one blank per ten samples.
- Figure 3-4 Please identify the location of the sediment and storm sewer samples on this figure

p. 4-9, § 4.1.3 and Table 3-3 The summary, presented in this section, of the quality control samples (blanks, duplicates) to be collected is not consistent with the information provided in Table 3-3. For example, the text states that the field duplicates will be collected at a rate of one per every ten samples for all sample matrices. However, the table indicates that no field duplicates will be collected for TPH in subsurface soil sample locations. Modifications should be made to correct these inconsistencies.

#### Health and Safety Plan

p. 4-7, §4.2 The listing of “Physical Hazards” presented on this page does not include the potential for fire or explosion from the flammable contaminants that may be encountered at the site. These hazards should be included in the listing of hazards, and they should also be addressed in Section 4.2.1.

p. 5-2, §5.1, ¶1 The paragraph is essentially a disclaimer noting the inadequacy of the proposed air sampling methods to detect contaminated particulate and contaminants of concern that are not detectable by the proposed methods. The text states that “in addition to the use of these screening instruments, emphasis will also be given to visual observations, as these contaminants may present themselves as particulates (or may be bound to particulates). It is also the logic used in the selecting respiratory protection as presented in Section 6.0.” Visual observation of airborne particulates as a method of assessing relative hazards is a subjective process without much validity. More information should be presented in the text that details how visual observations would minimize worker exposure to contaminants that are non-detectable by the proposed air sampling methods.

p. 7-1, §7.0 The site control measures described in this section are generic control measures. According to the background information provided, areas immediately adjacent to the excavation pit and other work areas are used frequently for recreational purposes. Therefore, the control measures described in this section may not be sufficient to prevent unauthorized access to these areas. Specific control measures designed to prevent access by recreational users of the adjoining land should be described in detail in this section.

HASP Attachment D A table is included in this section titled “Heat Stress Prevention Work-Rest Regimen Guidelines.” The table presents wet bulb globe temperatures (WBGT) in °F that relate to prescribed work-rest schedules. However, there is no indication in the text of this attachment that indicates that WBGT measurements are to be collected at the work site. If WBGT measurements are to be collected, it should be included in the text in the

“Heat Stress Monitoring” section of the attachment. If this measurement is not to be collected, the table should be deleted.