



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-831-5508

November 12, 1998

Al Haring
U.S. Department of the Navy
Northern Division
Naval Facilities Engineering Command
10 Industrial Highway
Code 1823-Mail Stop 82
Lester, PA 19113-2090

RE: Surface Soil Sampling Work Plan, Old Fire Fighter Training Area,
Naval Education and Training Center, Newport, Rhode Island

Dear Mr. Haring,

On November 10, 1998 the Rhode Island Department of Environmental Management, Office of Waste Management (RIDEM) met with the Navy and the United States Environmental Protection Agency (EPA) to develop a Work Plan for surface soil sampling at the Old Fire Fighter Training Area at NETC. This meeting was held in order to expedite the development of this Work Plan outside of the normal Federal Facility protocol in an effort to facilitate a rapid field sampling effort.

While we were able to come to an agreement on a number of issues, specifically with regard to sample locations, sample quantity, and for the majority of analytical parameters, we were unable to resolve the technical issues that are described in more detail below:

- Sample Depth

RIDEM noted that our regulations require that surface soil samples be collected from the zero to two-foot interval. Furthermore, in order to add an additional element of conservatism in the human health exposure scenario, these samples are typically collected from the most contaminated zone within this two-foot interval. As the present proposal calls for sample collection within the zero to one-foot interval, the samples will not address our requirements nor are they the most conservative. As long as the Navy intends to reuse this site for a youth center, RIDEM believes that following a more conservative approach, regardless of our differing requirements, is more protective of human health and is therefore the path that should be followed.

Page Two
A. Haring
12 November 1998

- Dioxin Analysis

Our Agencies decided that dioxin analysis would be carried out at a limited number of locations across the site. As discussed during our meeting, furan is typically an indicator for the presence of dioxins and quicker and cheaper to analyze for. Therefore, the use of furan as an indicator for which samples to analyze for dioxins will increase the likelihood of detecting dioxins if they exist at the site. It was stated that logistics associated with holding times for dioxins would prohibit the use of this selection process. Please confirm that an accelerated SVOC analysis would not allow for this selection process due to the holding time for dioxins. Should the holding time allow for this process it should be employed in each of the designated areas.

In closing, RIDEM does not concur with the proposed sampling plan for the Old Fire Fighter Training Area as a result of the issues outlined above. Please contact Paul Kulpa at (401) 277-2797 ext. 7111 or me at extension 7137 to resolve these issues prior to initiating your sampling activities.

Sincerely,



Warren S. Angell II, Supervising Engineer
Office of Waste Management

cc: Terrence Gray, Chief, DEM OWM
Paul Kulpa, DEM OWM
Mary Sanderson, EPA Region I
David Daracz, NETC
Kymberlee Keckler, EPA Region I
James Schafer, Northern Division
Melissia Griffen, NETC