



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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February 25, 2000

James Shafer, Remedial Project Manager
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: Draft Work Plan Background Soil Investigation for Old Fire Fighter Training Area, Naval Station Newport, Newport, Rhode Island

Dear Mr. Shafer,

The Department of Environmental Management Office of Waste Management has received the Draft Background Soil Investigation Work Plan for the Old Fire Fighting Training Area, dated 9 February 2000. In the correspondence attached to the submittal the Navy indicated that the Draft Work Plan was sent to the regulatory agencies for review. The correspondence did not indicate that the Navy wanted an exemption from the normal regulatory review time specified in the Federal Facilities Agreement. Furthermore, the start date for field activities was not noted in the cover letter. The State therefore initiated normal review procedures.

During the review process it was noted that, Appendix A of the Work Plan, specified that sampling procedures were to be initiated on 31 January 2000. This meant that the fieldwork outlined in the Draft Work Plan was to be completed prior to sending the Work Plan to the regulatory agencies for review. The Office immediately contacted the Navy and the Navy's contractor concerning this issue. The Office was informed that the fieldwork had been completed during the week of 14 February 2000. The Office was not notified concerning the start date for fieldwork. This lack of notification occurred despite the fact that that the Office had previously, and consistent with its policy for all fieldwork on this and other sites, had requested notification so that the Office could provide the necessary field over sight.

The State is concern with the Navy's activities with respect to this Work Plan. The Office acknowledges that the general approach and sample locations for this project was discussed during a meeting held on 8 December 1999, however, all of the details, which are presented in the Work Plan, were not. Obviously, there is no utility in reviewing a Work Plan for regulatory consistency if the work specified in the Plan is to be implemented prior to the regulatory review. Therefore, as the cover letter states that the Plan was submitted for regulatory review, it should have been submitted in a timely fashion in order to allow for this process.

In regards to regulatory oversight, the Federal Facilities Agreement specifies that the Navy shall allow for said oversight of field activities. This oversight allows the regulators to review field activities and ensure that said actions are performed in a manner, which are consistent with regulatory requirements. This is beneficial to the Navy, as it has resulted in activities being correctly implemented thus avoiding the need to repeat these events.

Finally, the State has consistently requested notification for all field activities conducted on the base. In addition, since schedules specified in the Work Plan may change due to logistic problems, such as weather or equipment availability, the State has always requested one-week notification for the start of fieldwork and twenty four-hour notifications for the cancellation of any field activities. As previously stated notification was not provided at this site.

The Office hopes that these problems can be avoided in the future and that the data collected at this site will such that it can be used for its intended purpose. In an effort to facilitate the submission of the report the State has attached comments directed toward the report generation.

If the Navy has any questions concerning the above, please contact this Office at (401) 222-2797, ext. 7111.

Sincerely,



Paul Kulpa, Project Manager
Office of Waste Management

cc: Warren S. Angell, DEM OWM
Kymberlee Keckler, EPA Region I
Melissa Griffen, NETC

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**Comments on Draft Work Plan
Background Soil Investigation
Old Fire Fighter Training Area**

**1. Section 1.2 Project Deliverables;
Page 1-2, Paragraph 3.**

Please add the following to the list of deliverables:

Map depicting the concentrations of arsenic and lead found in the surface and subsurface soils at the various sampling locations.

Summary table of analytical data as well as a separate summary table for arsenic and lead.

Map and summary table as describe above for any other analyte which the Navy intends to request a background exemption.

Table describing the depth and geologic characteristic of each sample, including whether said samples was collected from the water table.

Summary tables of statistical test employed including sample results and statistical critical values (as an illustration if a test for normality is conducted the table should include the test result for the sample data as well as the critical or cut off value from the test which will determine whether the sample is normal)

**2 Section 5.0, Data Analysis and Statistical Testing;
Page 5-1, Whole Section.**

This section of the report discusses the statistical test that will be used to evaluate the data. Although not stated it is assumed that this evaluation will include results for standard statistical test. These test include, but are not limited to, the mean (geometric/arithmetic), median, mode, variance, range, minimum, maximum standard deviation, interquartile range, percentiles, variation, sum, count confidence level skewness, and kurtosis. All of this information should be presented in table format as appropriate. In addition the sample results for a particular contaminant that the Navy is performing a background assessment on, will be depicted in tables in ascending order (i.e.. arsenic values will be placed in a table in ascending order). The Office recommends placing the above statistical data below the ascending order values.

**3 Section 5.0, Data Analysis and Statistical Testing;
Page 5-1, Whole Section.**

This section of the report notes that the Sharpio Wilks Test will be used to access normality. There area number of statistical test that may be used to access normality. Should the Sharpio Wilks be inappropriate other test may be employed.

**4 Section 5.0, Data Analysis and Statistical Testing;
Page 5-1, Last Paragraph.**

This section of the report states that the 95 % UCL will be used to determine the background concentration. It is premature to state whether the 95 % UCL will be employed as the background concentration. Accordingly, the report should also evaluate other values such as the mean, etc.