



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-831-5508

October 30, 2001

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: Work Plan Sediment Predesign Investigation for Old Fire Fighter Training Area, Naval Station
Newport, Newport, Rhode Island

Dear Mr. Shafer,

The Rhode Island Department of Environmental Management, Office of Waste Management (RIDEM) has reviewed the Work Plan for Sediment Predesign Investigation for Old Fire Fighter Training Area, dated 24 September 2001. Attached are comments generated as a result of this review.

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

Sincerely,

A handwritten signature in cursive script that reads "Paul Kulpa".

Paul Kulpa
Office of Waste Management

cc: Mathew DeStefano, DEM OWM
Richard Gottlieb, DEM OWM
Kymberlee Keckler, EPA Region I
Melissa Griffin, NSN

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**Comments on Draft Work Plan
Sediment Pre-design Investigation
For
Old Fire Fighter Training Area**

1. General Comment.

Previously, the Navy agreed to submit preliminary remediation sediment values for all of the contaminants found at the site. These values would be derived independent of any mechanism in the preliminary remediation goal process, which is designed to limit the number of analytes. That is, the proposed remediation goal process would eliminate certain contaminants based upon a number of factors, such as collocation with other contaminants, screening via biotoxicity, etc. Please, as agreed submit the requested material.

**2. Page 3-2, Section 3.2.1,
Sample Collected from Grid Points Within the Eelgrass Areas, Paragraph 3.**

“An estimated 12 samples will be collected from locations within the eelgrass beds at 100 foot intervals as shown in Figure 3-1.”

Figure 3-1 was not included in the State’s copies of the report. Drawing 3-1 does not depict the twelve samples in the eel grass beds, and the samples shown in the bed are not at 100 foot intervals. Please provide the requested figure.

**3. Page 3-3, Section 3.2.3,
Supplemental Samples, Paragraph 4.**

“ These samples, will be collected as one sample from each location, from the 0-0.5 interval. The purpose of these samples is to identify contaminant concentration off the grid to form a more complete picture of the extent of contaminated sediments at the OFFTA site.”

The function of the samples taken from grid points outside of the eel grass area, and the supplemental samples is to determine the extent of contamination. In addition, the depth of contamination exceeds six inches. Therefore, the same sampling scheme (0-2 feet) should be applied to both sample locations.

4. Table 3-2, Analytical Methods

The table specifies that samples will be analyzed for PAHs and metals. Although not stated it is assumed that the full swept of SVOCs, metals and TPH will be analyzed at each location in order to address the Office of Waste Management concerns with respect to the PRGs and the fact that the primary source of contamination at the site is petroleum related.