



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

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NAVSTA NEWPORT RI
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December 8, 2003

Mr. Curtis Frye
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: Draft Work Plan, Soil Pre-Design Investigation for the Old Fire Fighting Training Area at the Naval Education and Training Center Superfund Site in Newport, Rhode Island

Dear Mr. Frye:

EPA reviewed the *Work Plan, Soil Pre-Design Investigation for Old Fire Fighting Training Area, Naval Station Newport, Newport, Rhode Island* dated November in light of its completeness, technical accuracy, and consistency. Detailed comments are provided in Attachment A.

There appear to be three objectives of this pre-design investigation, determine 1) volume and location of soil and debris to be removed, 2) parameters for soil and debris disposal, and 3) geotechnical characteristics for stone revetment construction. The parameter for soil and debris disposal objective does not appear to have been met by actions proposed in the work plan. In Section 1.0, the work plan states that one of the tasks in the work plan is "Analyzing soil samples to determine disposal requirements and restrictions." It further states on page 1-2 that an outcome of the pre-design investigation will be that "waste disposal characteristics will be determined." However, the analytical plan does not appear to include analytes typically evaluated for disposal options. Waste characterization for disposal of soil and segregation of debris needs to be revisited and the work plan modified as necessary to collect appropriate data to meet this objective.

I look forward to working with you and the Rhode Island Department of Environmental Management toward the cleanup of the Old Fire Fighting Training Area. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,

Kimberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: Paul Kulpa, RIDEM, Providence, RI
Amanda Cerise, NETC, Newport, RI
Jennifer Stump, Gannet Fleming, Harrisburg, PA
Steven Parker, Tetra Tech-NUS, Wilmington, MA

ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. 1-1, §1.0	The first bullet in the fifth paragraph refers to collecting continuous soil samples throughout the overburden. However, review of the sampling plan details in Section 3.2.1 indicates that continuous soil samples (samples from each two-foot vertical interval during drilling) will not be collected. Please edit this bullet to make the sampling plan text consistent.
p. 2-12, §2.5.6	The discussion in the fifth sentence regarding the consequences of false positive and false negative decisions does not appear to be correct. First, the description of the false positive is self-contradictory and needs to be corrected. Second, a Type II error occurs when a false hypothesis is accepted; this results in a false positive. Therefore, given the null hypothesis that all soil is <u>contaminated</u> (assumed to mean at greater than the action levels), a false positive would result in accepting a false hypothesis, so soil with contamination less than the action levels would be excavated needlessly. A false negative is the result of a Type I error in which a true hypothesis is rejected. Therefore, with the stated null hypothesis, a false negative would result in mistakenly leaving soil with contamination exceeding the action levels on site because it was thought to be uncontaminated. Please review this text and the discussion in Section 4.1.1.1 for consistency and correct the text as appropriate.
p. 3-1, §3.0	The five activities listed in this section are not consistent with the activities listed in Section 1.0. In order to characterize the soil for disposal options, as stated in Section 1.0, additional analyses would typically be required beyond that proposed in Section 3.0. Please review the content of Section 3.0 and edit the text to include a presentation of waste characterization for disposal options, if that is an objective of this pre-design investigation.
p. 3-2, §3.2.1	<p>The first sentence in the second paragraph, that states that continuous soil samples will be collected, contradicts the text in the first bullet in this section and the text in Section 2.5.4 that state that samples will be collected from every other 2-foot interval. Also, the statement that samples will be collected to bedrock or a maximum of 20 feet below ground surface (bgs) is also contradicted by the text in the first bullet in this section. Please review and correct the text as appropriate.</p> <p>Furthermore, it is not apparent that the proposed sampling depths will be adequate to characterize soil underlying the two tallest soil mounds or the depth of contamination in the vicinity of B-8, where odors were detected</p>

down to 22 feet bgs. It appears that borings SB411, SB412, SB433, and possibly SB407 should be deeper for those reasons. Please review and correct as appropriate.

Figure 3-1 The legend is not complete because it does not identify all the symbols used in this figure. Also, it appears that TP-15 is shown in two locations but TP-16 is missing. Please correct the figure as appropriate.

Boring SB421 will be installed in the vicinity of TP-1. According to Table 2-1 petroleum in a pipe was observed at TP-1. While the details of this observation are not known, if there is a possibility of a release being caused by damaging the pipe during the drilling of SB421, precautions should be made, such as pre-excavation with a backhoe, to avoid such a release. Please edit the work plan as necessary to address this concern.

Table 3-2 If waste characterization for disposal is an objective of this pre-design investigation, please add the requisite analytes for waste characterization to this table.

p. 4-4, §4.1.2.2 The last sentence in this section states that rinsate blanks will be collected at the rate of one per two days of sampling. This contradicts Table 3-1, Note (1) that states that rinsate blanks will be collected daily. Please correct as appropriate.

Table 4-1 The TPH project action limit is based on RIDEM regulations, this should be indicated in the table.

The table does not include dieldrin. Dieldrin was selected as a soil COC and a PRG was derived for dieldrin in the OFFTA FS. Please include the dieldrin project action limit of 40 ug/kg in Table 4-1.

The units listed in the project action limit column are only appropriate for listed organic analytes. TPH and inorganics are mg/kg. Having units listed in the TPH row does not rectify the discrepancy for the inorganics. The table should be edited to more appropriately present units.

Please edit this table to include the analytical methods associated with the proposed laboratory limits or otherwise reference the proposed analytical methods. It is noted that the laboratory quantitation limits listed for arsenic and beryllium do not satisfy the project quantitation limits, and in the case of beryllium, the quantitation limit does not satisfy the project action limit. Please clarify why the proposed limits are satisfactory and discuss whether alternative analytical methods should be used to achieve the proposed project quantitation limits.

p. 4-7; §4.3.1

Under Quality Control (QC) Samples, in the discussion of duplicates in the second paragraph, please also note that the depth of each duplicate sample should also be recorded in the field log book.

In the fourth paragraph where rinsate blanks are discussed, please explain why the rinsate blank identification number should refer to the earlier sampling location rather than the subsequent sampling location. If the rinsate blank is contaminated, it would be important to know which sample had been impacted rather than which sample caused the impact. Although the log book could be properly annotated to record the sampling sequence, it appears illogical to number the rinsate blanks as proposed.

Note also that the QC sample identification proposed in this section conflicts with the identification procedure presented in SOP CT-04 for QC samples. Please review and correct as appropriate.

Appendix A, SOP CT-04, Revision 1, Section 5.5: Identification of QC samples with a date and sequence number rather than a sample location reference will require that careful and detailed field records be maintained so that the QC samples can be correlated with field samples. For example, if a rinsate blank is contaminated, it will be important to know what field sample was collected after the rinsate blank to see if the contamination in the rinsate blank also appears in the field sample. Please ensure that the field documentation SOP properly addresses this concern if the proposed QC sample identification method is used.

Appendix A, SOP SA-1.3, Revision 7, Section 5.2.1.2: Although the current work plan may or may not require the collection of volatile organic compound (VOC) samples (please refer to general comment), future sampling at the site may require such samples. Therefore, please note that the text in the referenced section has some omissions that are pertinent to the sampling procedure and some discrepancies compared to Section 6.0 of SW-846 5035.

For samples that are preserved in the field for both high (medium) and low level VOC concentrations, an additional unpreserved sample volume must also be collected to determine the percent moisture in the sample. Also, the ratio of methanol to sample volume specified in the SOP differs from SW-846 5035. Since methanol dilutes the VOC concentration, excess methanol is not desirable. Note also that the sodium bisulfate preservation method uses only 5 milliliters of liquid; however, the SOP text states that the soil sample should be collected in the manner described for the methanol preservation method, which recommends collecting a 10 gram sample volume. That is too much sample volume for 5 milliliters of liquid. Please review and correct this SOP as appropriate.

Appendix A, SOP SA-6.1, Revision 2, Attachment A: It is noted that this table only lists EnCore samplers for soil VOC samples; however, field preserved soil VOC samples are commonly collected and are discussed in detail in SOP SA-1.3. It is recommended that this attachment be updated to include field preserved soil VOC samples.