



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

July 28, 2004

Curt Frye, 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 for Excavation, Transportation and Disposal Services, Site 9, Old Fie Fighting Training Area, Naval Station Newport, Newport, Rhode Island

Dear Mr. Frye,

The Rhode Island Department of Environmental Management, Office of Waste Management has reviewed the Work Plan for Excavation, Transportation and Disposal Services, Site 9, Old Fie Fighting Training Area dated July 12, 2004. 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
Cornellia Mueller, NSN

1987



**Comments on
Work Plan for Excavation, Transportation and Disposal Services,
Site 9, Old Fie Fighting Training Area**

**1. Section 2.2.1, Mobilization,
Page 4.**

The report notes that water from the truck wash will be drummed and sent off site. During the Melville North Landfill removal action contaminated water was allowed to pond in areas that were scheduled to be subsequently removed. This eliminated the need to dispose of contaminated water. The Office of Waste Management will evaluate similar proposals for truck wash water at this site.

**2. Section 2.2.3, Erosion Control Measures,
Page 7.**

The work plan notes that jersey barriers will be placed along the shoreline north of mounds 1 and 2 for storm surge protection. The work plan should note whether these barriers have been found to be effective against storm surges at other locations. In addition, since the removal action extend to existing grade, the report should note why these barriers are necessary. Finally, be advised that similar devices were not employed during the removal action conducted at Melville North Landfill.

**3. Section 2.9.4, Disposal Facilities,
Page 19.**

This section of the work plan lists the possible disposal facilities for waste generated at the site. Please be advised that listed locations include processing and transfer facilities. Transfer or processing facilities are not the final disposal locations for contaminated soils. Measures will have to be taken to track the contaminated soils through these facilities to the ultimate final disposal location. It is the Navy's responsibility to ensure that any contaminated soils generated at the site are tracked and disposed of at the appropriate waste management facility. The work plan must specify how this will be accomplished. Be advised that all bill of lading, including final disposal locations must be provided in the Close Out Report.

**4. Section 2.10, Site Restoration,
Page 20.**

The proposed restoration material is topsoil and the planting of grass as a vegetated cover. The Navy may also wish to evaluate alternative temporary covers, such as gravel, crushed shells, etc, which may also be appropriate for site conditions, especially if the removal action is completed at a date which does not allow for vegetation to grow.

**5. Section 3.0, Reporting and Documentation,
Page 22.**

In order to allow for regulatory oversight, this section of the work plan must include a section on regulatory notification. Since schedules are dynamic and subject to weather and other unforeseen conditions, the work plan must specify that the regulatory agencies will be emailed or faxed a weekly update of upcoming field events. In addition, twenty-four hour notification is requested for changes in the schedule when possible.