



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
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NAVSTA NEWPORT RI
5090 3a

July 30, 2004

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 for the Excavation, Transportation and Disposal Services at Site 09, Old Fire Fighting Training Area

Dear Mr. Frye:

EPA reviewed the "Work Plan, Transportation and Disposal Services, Site 09 Old Fire Fighting Training Area", Naval Station Newport, Newport, Rhode Island" dated June 10, 2004 in light of its completeness, technical accuracy, and consistency. Detailed comments are provided in Attachment A.

Appendix B was missing from this copy of the work plan. Please provide it.

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
Cornelia Mueller, NETC, Newport, RI
Jennifer Stump, Gannet Fleming, Harrisburg, PA
Steven Parker, Tetra Tech-NUS, Wilmington, MA

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ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. 5, §2.2.1	Please review the calculations related to the size of the stockpiles. A stockpile 20 feet in diameter by 5 feet high has an approximate volume of only 20 cubic yards, assuming 2H:1V side slopes. Stockpiles of 500 cubic yards would be more difficult to manage and it would be difficult to obtain representative stockpile samples for characterization. EPA recommends that the stockpiles be limited to 100 cubic yards (approximately 36 feet in diameter by 9 feet high) to facilitate the collection of representative characterization samples.
p. 7, §2.2.3	If the Jersey Barriers are intended to be permanent structures, as indicated by the work plan, the barriers should be constructed of Type II or Type V air-entrained concrete, if possible, to provide resistance to sulfate degradation by the seawater. This would be consistent with Coastal Resources Management Regulations which states at 300.2 D(2)(a)(7): "Concrete structures which will come in contact with salt water shall be constructed with concrete which utilizes a Type II or Type V air-entraining Portland cement or an equivalent that is resistant to sulfate attacks of seawater."
p. 9, §2.2.3	Under Maintenance and Inspections, please edit the first sentence to state that erosion controls shall be inspected daily, not weekly. Nothing less than daily inspections will be considered acceptable.
p. 11, §2.5	The text states that any debris or structure protruding from the target excavation depth will be cut off or removed. Does this also pertain to the buried foundation that apparently exists under the Central Mound? Will such structures be removed at a later date? Based on the prior test pit data, at what elevation is this buried foundation expected to be encountered?
p. 12, §2.7	The 500 cubic yard stockpiles will be difficult to manage and will make the collection of representative characterization samples difficult. For example, a 500 cubic yard stockpile would be approximately 60 feet in diameter by 15 feet high. Please limit stockpile size to 100 cubic yards.
p. 13, §2.8	The proposal to collect eight-point composite samples is acceptable for stockpiles up to 100 cubic yards. If larger stockpiles are used, the plan should be revised to ensure that stockpile samples will be representative. The current proposal will not do that for the 500 cubic yard stockpiles.

- p. 13, §2.8 The four step process for collecting composite samples is not clearly consistent with the process described in the first paragraph on this page, which describes the compositing of sub-samples from each quadrant into a representative quadrant sample. Please clarify the descriptions of the sample compositing process to be consistent.
- p. 13, §2.8 The second sentence in both the four-step composite sample description and in the three-step grab sample description is either awkwardly worded or something is missing from the sentences.
- p. 14, §2.8 The text under Analysis suggests that a variety of TCLP analyses will be conducted; however, the tabulated analyses refer to only TCLP analysis for metals. Please correct the analytical requirements for this work to eliminate the apparent inconsistency.
- p. 22, §2.10.2 The second paragraph states that the contractor will water all seeded areas within 72 hours of placement of the seed. That is only acceptable if hydroseeding is used. If mechanical seeding is used, the seed must be watered immediately following placement. Please correct accordingly.
- Excavation Site Plan
- a. It appears that Unitec has added symbols to Tetra Tech NUS, Inc.'s drawing without deleting Tetra Tech's symbols, which causes some confusion regarding the proposed erosion controls. It appears from the symbols on the drawing that Jersey barriers are proposed only for the area near Mounds No. 1 and No. 2, which is also suggested in Section 2.2.3. This is acceptable if the haybales at the Central Mound are located above the high water line and are not susceptible to damage from high water and waves. Also, it appears that the haybales near Mounds No. 1 and No. 2 are located down the slope and are susceptible to high water and waves. Therefore, the ends of the Jersey barrier lines should be extended up the slope to protect the haybales from high water, waves, and infiltration around the ends of the barriers.
 - b. There are two catch basins located adjacent to Mound No. 2 that need to be protected during excavation. Please provide stone filter inlets for these two catch basins and any other catch basins encountered during the excavation activities. Recommend using 2 layers of a geotextile filter fabric and a minimum of 6 inches to 12 inches of stone over the fabric.
 - c. Please include additional detail for the haybale barriers. If a barrier using only a single haybale row will be used, please edit the detail to require that the interface between bales shall be chinked with straw or hay to prevent migration between bales. Also, edit the detail to note that a

minimum of 4 inches of embedment below ground surface is required for the haybale barriers.

d. It is noted that the circles within the staging area, which are assumed to represent stockpiles, scale as 40-feet in diameter versus the 20-foot diameter discussed in the work plan. This larger size is more appropriate and closer to the requirement for 100 cubic yard stockpiles, which EPA recommends as the largest manageable size for this project.

p. 4, §4.0 (HSP)

The last bullet lists confirmation sampling; however, it is not apparent that confirmation sampling will be required for this project. Please correct as appropriate.