



**DEPARTMENT OF THE NAVY**

ENGINEERING FIELD ACTIVITY, NORTHEAST  
NAVAL FACILITIES ENGINEERING COMMAND  
10 INDUSTRIAL HIGHWAY  
MAIL STOP, #82  
LESTER, PA 19113-2090

IN REPLY REFER TO

5090  
Code EV23/CF  
August 12, 2004

Ms. Kymberlee Keckler, Remedial Project Manager  
Federal Facilities Superfund Section  
USEPA Region 1  
1 Congress Street, Suite 1100  
Boston MA, 02114-2023

Mr. Paul Kulpa, Project Manager  
Office of Waste Management  
Rhode Island Department Of Environmental Management  
235 Promenade St.  
Providence Rhode Island, 02908-5767

Dear Ms. Keckler/ Mr. Kulpa:

SUBJECT: DRAFT WORK PLAN, EXCAVATION, TRANSPORTATION, AND  
DISPOSAL SERVICES FOR MOUND REMOVAL AT SITE 09, OLD  
FIRE FIGHTING TRAINING AREA, NAVAL STATION NEWPORT,  
NEWPORT, RHODE ISLAND

Enclosed please responses to comments for the subject work  
plan. Based on these responses, the work plan will be finalized  
and submitted and field work will begin at the site.

If you have any questions, please do not hesitate to contact  
me at (610) 595-0567 extension 142.

Sincerely,

  
CURTIS A. FRYE, P.E.  
Remedial Project Manager  
By direction of the  
Commanding Officer

Enclosure: 1. Responses to USEPA Comments, Draft Work Plan for  
Excavation, Transportation, and Disposal  
Services, Site 09, Old Fire Fighting Training  
Area, Naval Station Newport, Newport, RI, June  
2004 (Comments dated July 30, 2004)

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2. Responses to RIDEM Comments, Draft Work Plan for Excavation, Transportation, and Disposal Services, Site 09, Old Fire Fighting Training Area, Naval Station Newport, Newport, RI, June 2004 (Comments dated July 28, 2004)

Copy to:

C. Mueller, NSN  
B. Krivinskas, ROICC Newport  
S. McFadden, TAG  
J. Stump, Gannett Fleming  
S. Parker, TtNUS  
T. Janss, Universe Technologies

**R spon s to Comm nts fr m USEPA  
On th Draft Work Plan,  
Excavation, Transportation, and Disposal Services  
Site 09, Old Fire Fighting Training Area  
Comments Dated July 30, 2004**

*Comment 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.*

**Response:**

The calculation will be reviewed, but the estimated size for stockpiles will remain at 500 cubic yards. Under this project, samples are being collected to determine disposal characteristics. This Work Plan is designed to obtain a sampling level/frequency required by licensed disposal facilities. 500 cubic yard stock piles were previously considered acceptable at the McAllister Point Dredging Soil Removal Project at Naval Station Newport.

*Comment 2:*

*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."*

**Response:**

The Jersey Barriers are not permanent, and the Work Plan will be revised accordingly. Removal of the Jersey Barriers will take place following the final soil removal and revetment construction efforts at Site 09.

*Comment 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.*

**Response:**

The Work Plan will be revised to include daily inspection of the erosion controls.

ENCLOSURE (1)

**Comment 4:**

*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?*

**Response:**

Under this project, the target excavation depth is one-foot below base grade elevation. Excavation of the mounds will proceed to a depth of one-foot below base grade elevation. If any debris or structure is uncovered that is protruding and extends below the target excavation depth, field judgment will be made to determine whether to remove the object entirely or cut it off at the target excavation depth. If the structure is left in place below the target excavation depth, it will be removed at a later date in association with the second phase of soil removal. Based on prior test pit data, we do expect to encounter the foundation buried under the Central Mound during the mound removal. If/when it is encountered, a field judgment will be made to either cut it off at the target excavation depth or remove it entirely.

**Comment 5:**

*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.*

**Response:**

The management of 500 cubic yard stockpiles is within our capability. Please see response to Comment #1.

**Comment 6:**

*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.*

**Response:**

Please see response to Comment #1.

**Comment 7:**

*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.*

**Response:**

The Work Plan will be revised to clarify the process.

ENCLOSURE (1)

*Comment 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.*

Response:

The Work Plan will be revised to clarify the process.

*Comment 9:*

*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.*

Response:

The Work Plan will be revised to clarify the analytical requirements.

*Comment 10:*

*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.*

Response:

The Work Plan will be revised to detail the requirement to water the seed immediately following placement.

*Comment 11:*

*Excavation Site Plan - 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.*

Response:

The Work Plan will be revised to detail the extension of the ends of the Jersey Barriers up the slope.

ENCLOSURE (1)

**Comment 12:**

*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.*

**Response:**

The Work Plan will be revised to include filter inlets for the two catch basins, which will include two layers of geotextile filter fabric and six to 12-inches of stone over the fabric.

**Comment 13:**

*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.*

**Response:**

The Work Plan will be revised to include detail of the single row of hay bales, which will be set at least four-inches into the ground and chinked with straw or hay.

**Comment 14:**

*It is noted that the circles within the staging area, which are assumed to represent stockpiles, scale as 40-foot 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.*

**Response:**

Comment noted. The Work Plan will be revised to depict the planned actual size of the stockpiles.

**Comment 15:**

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

**Response:**

Under this project, confirmation sampling will not be conducted. The Health and Safety Plan will be revised accordingly.

ENCLOSURE (1)

**Responses to Comments from RIDEM  
On the Draft Work Plan,  
Excavation, Transportation, and Disposal Services  
Site 09, Old Fire Fighting Training Area  
Comments Dated July 28, 2004**

*Comment 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.*

Response:

Comment is noted, but the Work Plan will remain as is on this issue.

*Comment 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 extends 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.*

Response:

The Jersey Barriers are being used as a precaution to protect against potential storm surge. This measure was instituted following Navy discussion with the CRMC. The use of Jersey Barriers has been concurred with by the CRMC (in their 19 July 2004 concurrence letter to the Navy CZCD).

*Comment 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.*

Response:

Comment is noted. The Close Out Report will include the requested information as detailed in Section 3.0, Reporting and Documentation - "Closeout Report", on page 23.

ENCLOSURE (2)

*Comment 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.*

Response:

Comment is noted. The Navy prefers grass in this area.

*Comment 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.*

Response:

It is understood that communication with the regulatory community is important. The Navy will manage regulatory communication. UNITEC will maintain communication with the Navy.