



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

February 8, 2007

James Colter
Remedial Project Manager (Code OPNEEV)
Facilities Engineering Command, Mid-Atlantic
Naval Facilities Engineering Command
9742 Maryland Avenue
Norfolk, VA 23511-3095

3680

Re: Revision 2, Remedial Investigation Work Plan Site 9, NUSC Disposal Area, NETC

Dear Mr. Colter,

The Rhode Island Department of Environmental Management, Office of Waste Management (RIDEM) has reviewed Revision 2, Remedial Investigation Work Plan Site 9, NUSC Disposal Area dated 8 January 2007.

In general the majority of the revisions in the work plan reflect changes agreed to in discussions held on November 3 and November 16, 2006. Additional clarification is requested for one comment (See Attachment).

Pursuant to these aforementioned discussions representatives from the US Navy, the Navy's consultant and RIDEM conducted a site inspection of the NUSC Disposal Area on December 19, 2006 to ascertain if additional areas of concern existed and to evaluate potential sampling locations. This inspection revealed the presence of drains associated with storage area and evidence of filling south of what was believed to be the southern end of the landfill. It was subsequently agreed that both of these areas warranted investigation.

In an effort to expedite the investigation and to reduce overall cost of the project it will not be necessary to submit a revised version of the work plan. Instead an addendum can be created which outlines the investigation to be conducted in these areas and the modification for the macro invertebrate analysis. Once approved this addendum can be attached to the Work Plan Revision dated January 8, 2007.

The Office of Waste Management looks forward to working with the Navy and the EPA in the investigation and remediation of this and other sites on the Newport Navy Base. If the Navy has any questions please contact RIDEM at (401) 222-2797, extension 7111.

Sincerely,

Paul Kulpa

Office of Waste Management

cc: Mathew DeStefano, DEM OWM
Richard Gottlieb, DEM OWM
Cornelia Mueller, NSN
Kymberlee Keckler, EPA Region I

Comments
On the Site 08, NUSC Disposal Area
Revision 2, Remedial Investigation Work Plan

**60. Section 3.2.3, Invertebrate Toxicity Test,
Page 3-27.**

Diversity analysis (population count of invertebrates in stream sediments, deployment of artificial substrates, etc) is typically performed in freshwater environments to assess impacts. It also provides additional information should there be differences in end results with other tests performed on the sediment, (for example results of chemistry test and toxicity tests conflict). Please modify the work plan to include diversity analysis.

Evaluation of Revision 2

The Navy has agreed to perform a diversity analysis. The proposed method is to employ a net to collect macro invertebrates from the water column. This method is acceptable for water column analysis. However, it has its limitations with respect to sediment sampling. The method does not work well in hard substrate areas or areas where rocks and other debris is present (as in illustration passing the net will not allow one to collect macro invertebrates which live under rocks). In soft sediments passing the net may not dislodge organisms buried in the sediments or in the debris (these organisms are typically dislodged by mechanical disturbing or kicking the sediments to a specified depth). Therefore, for the sediment sampling alternate methods are necessary. Quantitative methods that have been used in the past include: collecting sediments from a one square meter area to the depth of bioturbation (in the stream down stream nets are necessary to collect organisms dislodged during the collection process, use of ponar samplers to collect sediments at depth in ponds, etc).