



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767 TDD 401-222-4462

January 29, 2009

Winoma Johnson
NAVFAC MIDLANT (Code OPNEEV)
Environmental Restoration
Building Z 144, Room 109
9742 Maryland Avenue
Norfolk, VA 23511-3095

RE: Draft Removal Action Completion Report, Non Time Critical Removal Action for Old Fire
Fighter Training Area, Naval Station Newport, Newport, Rhode Island

Dear Ms Johnson,

The Rhode Island Department of Environmental Management, Office of Waste Management has reviewed Draft Removal Action Completion Report, Non Time Critical Removal Action for the Old Fire Fighter Training Area,, submitted on December 15, 2008. Attached are comments generated as a result of this review.

As the Navy is aware the removal action was conducted employing a clean up objective which was not approved by the Office of Waste Management. Similarly, certain aspects of the remedial investigation did not meet the requirements of this Office. Accordingly, the submitted comments have focused on the content of the report. 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: Matthew DeStefano, DEM OWM
Richard Gottlieb, DEM OWM
Robert Lim, EPA Region I
Cornelia Mueller, NSN

**Draft Removal Action Completion Report
Non Time Critical Removal Action
for the
Old Fire Fighter Training Area**

1. General Comment

Please include an Appendix which contains the following items: test pits/excavation logs, a copy of the original field note books, and photographs which were taken of the test pits and other excavations.

**2. Section 2.3.3.2, Area A
Page 2-4, Paragraph 3**

Please add the following to the end of this paragraph:

Construction debris, bricks, concrete, soil, etc, all of which was heavily contaminated with oil was found immediately adjacent to and on both sides of the active storm water drain which traverse the central portion of the site in a north south direction. The visibly heavily contaminated soil and construction debris extended into the water table to a depth of approximately three feet. Free product (measurable oil to sheens) was observed on the water. The contaminated material emitted a strong petroleum odor which exhibited characteristics of heavy to light fuels. A concrete wall, which butted against the storm drain, was found at the northern end of the excavation. It was not known whether the concrete wall was part of a foundation or other structure. Test pits were not dug to investigate the wall or ascertain whether contaminated soil and or construction debris was present on the other side of the wall.

**3. Section 2.3.3.2, Area B-1
Page 2-5, Paragraph 3**

Please add the following after the fourth sentence: Similar to Area A oil contaminated construction debris, sheens and a strong petroleum odor was observed in the deeper intervals of the excavation. The observed contamination extended into the water table.

**4. Section 2.3.3.2, Area B-1
Page 2-5, Paragraph 3**

“No contaminated liquid or soil was observed in the pipe; therefore it was not further excavated.”

Please remove the above and insert the following statement.

The sections of pipe which was left in place contained a blacken material which exhibited a petroleum odor.

5. Section 2.3.3.2, Area B-1
Page 2-5, Paragraph 3

“No contaminated liquid or soil was observed in the pipe along the shoreline.”

Please remove the above and insert the following statement.

The discharge end of the pipeline contained black stained soil and a heavy sheen was observed on the water when the terminus of the pipe was excavated.

6. Section 2.3.3.2, Area B-1
Page 2-5, Paragraph 3

Please add the following statement to the end of the paragraph.

The remainder of the pipeline was left in tact and not investigated with test pits.

7. Section 2.3.3.3, Area B-2
Page 2-6, Paragraph 1

Please add the following after the third sentence.

Similar to soils found at the other nearby hot spots, construction debris and soil, heavily contaminated with oil, was found in the deeper intervals of the excavation. The observed contamination extended into the water table, and free product (measurable to sheens) were found on the water table. The contaminated material emitted a strong petroleum odor which exhibited characteristics of heavy to light fuels.

8. Section 2.3.3.3, Area B-2
Page 42-6, Paragraph 1

“No contaminated liquid or soil was observed in the pipe; therefore it was not further excavated.”

Please remove the above and insert the following statement

The sections of pipe left in place contained oil and oil sludge, which emitted strong, heavy oil, petroleum odor. RIDEM stated that the Navy may elect to either test the material to confirm that it was oil or simply acknowledge that it was oil in the report. The Navy elected not to test the material as it was clearly oil. As noted, the remaining sections of the pipe, which contained oil, were grouted and sealed in place and not removed in accordance with the work plan. In addition, the pipeline was not investigated with test pits.

9. Section 2.3.3.3, Area B-2
Page 2-6, Paragraph 3

Please add the following to the end of this paragraph.

The discharge end of the pipeline contained black stained soil and a heavy sheen was observed on the water when the terminus of the pipe was excavated

10. Section 2.3.3.5, Area D
Page 2-7, Paragraph 2

Please add the following to the end of this paragraph.

During the excavation of the asphalt pad in Area D a section of concrete was uncovered beneath the asphalt. It was not evident whether this concrete was part of a foundation, an underground structure or simple fill. As the concrete was lower than the excavation depth specified in the work plan a test pit was not excavated in this area.

11. Section 2.3.4.2, Foundation 2
Page 2-10, Paragraph 5

“Excavation of Foundation 2 west of Building 144 began on...

The report is a public document and the above may be misinterpreted that foundation # 2 was excavated, i.e. removed. As the foundations were not removed and as the excavation was limited to test pits and limited removal actions, please modify the above as follows:

Test pit investigation of Foundation 2 west of Building 144 began on...

12. Section 2.3.4.2, Foundation 2
Page 2-10, Paragraph 6

“Global returned to the area on April 16, 2008 and completed the excavation of the entire former Building 135 foundation...”

As noted above the foundation was not removed therefore please modify the following as follows:

Global returned to the area on April 16, 2008 and completed the test pit investigation of the former Building 135 foundation.

13. Section 2.3.4.2, Foundation 2
Page 2-10, Paragraph 6

Please add the following:

A six inch pipe running north/south was found at the north east corner of Building 135. The pipe and the soil around it did not exhibit signs of contamination. RIDEM requested that test pits be dug into the water table at this and other locations along the perimeter of Buildings 134, 135, 136, and 137. At the northern end of Building 135 the test pit was extended into the water table and heavily contaminated soil, which exhibited a strong petroleum odor and freely released oil was found at depth and in the water table. Globules of oil rose in the test pit and free product was observed. Contaminated soil excavated from the test pits was sent for offsite disposal. At the southern end of Building 135, in-between Buildings 134 and 135, two cast iron pipes were found. Petroleum contaminated soil was observed beneath one of the pipes. Test pits were not dug into the water table at this location. Test pits were not dug into the water table at other locations along Building 134-137.

14. Section 2.3.4.2, Foundation 2
Page 2-11, Paragraph 1

Please add the following:

A test pit was partially excavated into the center of the foundation of Building 136, the depth of which was limited by the presence of rebar and other construction debris. Test pits were not dug through the center of the foundations of the other buildings in this area.

15. Section 2.3.4.3.1, Foundation 3
Page 2-12, Paragraph 1

“Visual staining or petroleum odor was observed in the excavation.”

For clarity, please modify the above as follows;

Visual staining, petroleum odor and free product (measurable to sheens) were observed in the soil and groundwater adjacent to the oil water separators.

16. Section 2.3.4.3.1, Foundation 3
Page 2-12, Paragraph 1

“An 8 inch iron pipe was observed exiting the eastern wall of the eastern structure. “

Please add the following to the above:

An 8 inch iron pipe was observed exiting the eastern wall of the eastern structure. The pipe contained an oil residue. The pipe extended to the east and then elbowed.

17. Section 2.3.4.3.1, Foundation 3
Page 2-12, Paragraph 1

“An 8 inch iron pipe was observed exiting the eastern wall of the eastern structure. “

Please include a discussion of the tracking associated with this pipe.

18. Section 2.3.4.3.2, Drainage Piping Associated with Foundation 3
Page 2-12

This section of the report indicates that the pipe which was tracked from the oil water separators was 12 inches in diameter. In the previous section it notes that there was an eight inch diameter pipe which exited the separators (eastern end of eastern separator). Please clarify.

19. Section 2.3.4.3.2, Drainage Piping Associated with Foundation 3
Page 2-12

Please note in this section that the pipe contained an oil residue.

20. Section 2.3.4.3.2, Drainage Piping Associated with Foundation 3
Page 2-13, Paragraph 1

“Global also encounter a concrete structure.....”

Please add the following sentence:

The pipe entered and exited the concrete structure which was fill of sand. The concrete structure was not excavated nor was test pits dug into the water table at the structure or at the terminus of the pipe which exited the concrete structure.

21. Section 2.3.5, Supplemental Exploratory Test Pits
Page 2-13, Paragraph 4

Please add the following statement after the first sentence.:

Test pits requested by RIDEM could not be dug at the suspect location of an UST on the eastern end of the site due the inability of the Navy to schedule the test pitting activities with the bridge construction. Test pits were also not dug at each of the suspect USTs at the site.

Please add the following statement after the second sentence.:

The test pits were designed to investigate specific locations. If a sidewall exhibited evidence of contamination, such as stained soils or flowing product the test pit was not expanded to track the observed source.

22. Figures 2-3-2-18
Page 2-13, Paragraph 4

The cited figures depict the length, width, depth of the excavations as well as the location of the samples. They appear to be photocopies of field notes and as such certain

aspects of the figures are not legible. Please submit CADD or equivalent depictions of these figures.