



RHODE ISLAND

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

October 23, 2009

Cornelia Mueller  
Environmental Protection Division, Code 408  
NSN PWD Bldg. 1  
1 Simon Pietri Drive  
Newport, RI 02841

RE: Draft Work Plan for Stone Revetment Replacement for Old Fire-Fighting Training Area  
Naval Station Newport

Dear Ms. Mueller

The Rhode Island Department of Environmental Management, Office of Waste Management has reviewed the Work Plan for Stone Revetment Replacement for Old Fire-Fighting Training Area Naval Station Newport received on October 19 and November 3, 2009. 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: Matthew DeStefano, DEM OWM  
Richard Gottlieb, DEM OWM  
Terry Walsh, DEM OWR  
Ken Anderson, RI CRMC  
Robert Lim, EPA Region I  
Winoma Johnson, Nav Fac

**Comments on the  
Work Plan for Stone Revetment Replacement for Old Fire-Fighting Training Area  
Naval Station Newport**

**1. General Comment,**

Please include a provision for notification of field work to be conducted at the site. Be advised that two week notification should be given prior to the start of field work, 24 hour notification, when possible should be given for cancelation of field work and since it is recognized that schedules are dynamic, a weekly email update of upcoming field activities should also be submitted.

**2. Section 3.4, Portadam Installation  
Page 3-6,**

The Work Plan should note that the Portadam and turbidity curtain will be installed in such a manner as not to adversely affect the adjacent eel grass beds on the western end of the site.

**3. Section 3.4, Portadam Installation  
Page 3-6,**

The Work Plan stipulates that the Portadam will be removed from the western end of the site once the revetment has been installed and the turbidity curtain will be subsequently removed. An eel grass bed is located on the western end of the site. The Work Plan must stipulate that the turbidity curtain will not be removed until the restored beach on the western end has stabilized and there is no longer a turbidity problem which may adversely affect the eel grass beds. This same provision also applies to the eastern end of the site.

**4. Section 3.5.1, Excavation Process  
Page 3-9, Paragraph 4**

The Work Plan states that excavation of contaminated soils will be limited to that necessary to install the revetment. Please be advised that the intent of the removal action is to remove all contaminated soil which cannot be practically removed after the revetment is installed. As such, the Work Plan must include a provision for the removal of contaminated soil if it is present beneath the base of the revetment, or located adjacent to the revetment (soils adjacent that cannot be easily removed at a later date without compromising the revetment). Please modify the Work Plan to include this provision.

**5. Section 3.5.1, Excavation Process**  
**Page 3-9, Paragraph 4**

The Work Plan states that pipes which extend beyond the foot print of the revetment will be plugged. The plan must state that if free product or sludges are found in the pipe it must be removed. Further, since the intent of the removal action is to remove pipes, structures and contaminated soils which cannot be removed at a later date without compromising the revetment, the plan must stipulate that the pipes and/or structures will be removed to a location where the rest of the pipe and/or structure can be easily removed at a later date without compromising the revetment.

**6. Section 3.5.1, Confirmatory Sampling**  
**Page 3-9, Paragraph 4**

Although not stated the confirmatory sampling process must be applied to the soils found beneath and adjacent to the two oil water discharge pipes which are scheduled to be removed from the site. In order to avoid confusion in the field please include this provision in the Work Plan

**7. Section 3.5.3, Confirmatory Sampling**  
**Page 3-11, Paragraph 5, Last Two Sentences**

This section of the report contains a definition of NAPL. Please note that this definition does not conform to State Regulations and as such this definition must be removed from the document.

**8. Section 3.5.3, Confirmatory Sampling**  
**Page 3-11, Paragraph 6**

This section of the Work Plan limits confirmatory samples to the eastern section of the site. Exceedances of State standards have been found on the eastern and western sections of the site, therefore the Work Plan must be modified to include confirmatory sample collection along both sections of the site.

**9. Section 3.5.3, Confirmatory Sampling**  
**Page 3-11, Paragraph 6**

The work plan proposes using Petro flag test kits. As a variety of oils have been found at the site, please include a provision to set the Petro flag meter to the most sensitive setting.

**10. Section 3.5.3, Confirmatory Sampling**  
**Page 3-12, Paragraph 1**

The Work Plan notes that if NAPLs are found discussions will take place with the Navy for possible action to address the NAPL. Please include a provision to contact the RIDEM if NAPLs are found in the excavation.