



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

**received**  
**4-30-93**

**DIVISION OF AIR AND HAZARDOUS MATERIALS**

291 Promenade Street  
Providence, R.I. 02908-5767

April 20, 1993

Francisco A. La Greca  
Remedial Project Manager  
U.S. Department of the Navy  
Northern Division  
Naval Facilities Engineering Command  
10 Industrial Highway  
Code 1823-Mail Stop 82  
Lester, PA 199113-2090

RE: Remedial Design Work Plan - Groundwater Treatment Interim Remedial Action  
near Tanks 53 and 56 at Tank Farm Five, Newport Education and Training Center,  
Newport, Rhode Island: January 1993

Dear Mr. La Greca:

Please find attached comments generated by the Division of Site Remediation (formerly the  
Division of Air and Hazardous Materials) concerning the abovementioned documents. If  
you have any questions concerning the comments, please contact me at (401) 277-2797.

Sincerely,

*Paul Kulpa*

Paul Kulpa, Project Manager  
Division of Site Remediation

cc: Warren S. Angell, DEM DSR  
Greg Fine, DEM DSR  
Andrew Miniuks, EPA Region I

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## REMEDIAL DESIGN WORK PLAN:

1. **Previous NETC Investigations, Page 1-2:  
Section 1.2, Paragraph 2.**

Despite the fact that this section is dedicated to previous investigations at the site, the State requests that the concurrent Phase II Work Plan development be mentioned. Furthermore, the State requests that the Navy briefly mention the scope of the Phase II investigations in a manner which will not promote confusion between that study and this Interim Remedial Action.

2. **Cleanup Activities to Date, Tanks 53 and 56, Page 1-6:  
Section 1.5, Paragraph 3.**

TCLP is the acronym for Toxic Characteristic Leaching Procedure. Please correct.

3. **Geologic Investigation Scope, Page 2-2:  
Section 2.1, Paragraph 1.**

"The proposed pumping well (PW-1) location is approximately 20 feet southwest of existing monitoring well MW-4."

Different hydraulic conductivities values are expected for the undisturbed portions of the aquifer, the portions of the aquifer excavated during the construction of the tanks and the back fill material used in the ring drain. The Navy has proposed conducting a pump test in the undisturbed portions of the aquifer, (this portion of the aquifer may have the lowest hydraulic conductivities value)> The State recommends conducting slug test in the monitoring wells in the immediate vicinity of Tank 53 and in the ring drain of Tank 53. This information is needed to ensure the proper placement of extraction wells at the site.

4. **Geologic Investigation Scope, Page 2-1:  
Section 2.1, Paragraph 2.**

Please provide a brief rationale for well placement.

5. **Geologic Investigation Scope, Page 2-2:  
Section 2.1, Paragraph 2.**

"No subsurface soil sampling for laboratory analysis will be conducted during the soil boring activities but an organic vapor (OVA) and lower explosive limits (LEL) monitoring program will be implemented during the drilling program."

The State does not concur with above statement.

The Navy should provide additional clarification concerning soil borings associated with monitoring well installation, and those associated with geotechnical explorations. In the text it is often confusing which type of boring is being referenced.

It is assumed by the State that the above statement refers to soil borings for the purpose of geotechnical exploration. The Navy has not provided any rationale explaining the proposed difference in the treatment of drill cuttings from well installations as opposed to those of the geotechnical soil borings. This rationale is necessary in order for the State to consider specialized treatment of geotechnical soil boring material. Said rationale should reference previous on-site studies and quantifiable data to be used in support of the location and treatment of the geotechnical borings. Otherwise, since Tank Farm Five is considered a hazardous waste site, all drill cuttings will be considered by the State as deserving equitable treatment.

If a satisfactory rationale for the proposed treatment of the geotechnical borings is communicated, then the State may recommend that the Navy make provisions for one subsurface soil sample per boring to be submitted for laboratory analysis only if a previously specified and agreed upon threshold criteria is surpassed. The Navy should propose this criteria for State concurrence. This sampling provision is necessary in order to properly insure State confidence in the proposed location of the groundwater treatment system structure.

**6. Geologic Investigation Scope, Page 2-2:  
Section 2.1, Paragraph 4.**

"The frequency of split spoon collection and OVA monitoring may be decreased if no detectable readings are observed during the first day of drilling."

The State feels that the OVA monitoring frequency should not be decreased based only upon the readings observed during the first day of drilling.