



**TETRA TECH**

C-NAVY-09-09-3315W

September 21, 2009

Project Number 112G00949

Mr. Paul Kulpa  
Rhode Island Department of Environmental Management  
Division of Site Remediation  
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Providence RI 02908-5767

Reference: CLEAN Contract No. N62467-04-D-0055  
Contract Task Order No. 458

Subject: RIDEM Letter September 17, 2009  
Site 17, Gould Island,  
Naval Station Newport, Newport, RI

Dear Mr. Kulpa:

The Navy is in receipt of your letter dated 9/17/09. Because your letter is in regards to field work planned to be conducted starting today, we are providing you an abbreviated response below. The text of your letter has been separated into six separate comments as stated in italics below. The responses to those comments are provided immediately following:

- 1) As the Navy is aware the Office of Waste Management has concerns with respect to the proposed sample locations 150 - 300 feet from the shore and feels sample distribution should be adjusted to afford better coverage of potential source and near shore impact areas.*

Response: The comment was noted in previous correspondence from RIDEM. It was explained at that time that the sample stations were chosen to bound the outer limits of contamination. After these samples are collected and analyzed, the stations for the BERA sampling will be selected, and those stations will be sampled for toxicity and more detailed chemistry. Additionally, the Navy complied with RIDEMS request to collect five samples at the shoreline at locations where they indicated.

- 2) In light of the proposed phase investigation of the site, the Office feels that it would be prudent to withhold six of the samples proposed for the outer edge until the results from the initial sampling event are obtained. At that point a decision can be made concerning the appropriate location for these samples.*

Response: The approach stated in the comment above would require an additional round of sampling prior to the BERA sampling. The approach described in the Tetra Tech Letter dated 9/3/09 has been approved by the USEPA, and will be used for the first step of the Phase 2 RI and BERA. RIDEM will have the opportunity to provide input on the selection of sample stations for bulk chemistry and ecological sampling in the later steps of the BERA.

- 3) *In regards to the adjusted sampling locations on the east side of Gould Island delineated in correspondence dated September 3, 2009 although not stated it is assumed that the sample designated for the PCB release associated with Building 54 will either be taken immediately adjacent or beneath the clean backfill area.*

Response: Sample station 447 will be collected from the intertidal area as close to the former location of Building 54 as possible.

- 4) *In addition, although not stated it is assumed that those locations designated for toxicity test would also undergo concurrent bulk chemistry analysis.*

Response: The comment is correct. The BERA sampling will include concurrent detailed chemistry analysis.

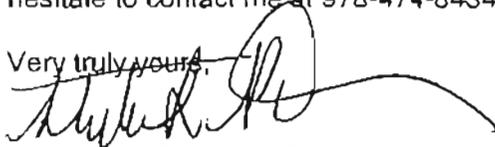
- 5) *Finally, the Office of Waste Management request split samples for all locations. The Navy may elect to employ the split sampling protocol employed at Carr Point.*

Response: Please note that only 10% of the samples provided are eligible for DSMOA funding for the period 2008 – 2010. If RIDEM has already received 10% of the samples collected during this period, there would not be funding to analyze them. If the State is conducting the analysis outside DSMOA, there would not be a limit. Regardless, the Navy will request QA/QC procedures that will be used to ensure that the state results can be used for comparability of the Navy's results. The Navy has, in the past provided split samples to those who request it as a matter of professional courtesy, understanding the cost of the collection, handling and transport of those samples.

However, there are practical matters for split sampling sediments in this case. For the cores collected from the Stillwater area, there is not anticipated to be any material left over to split with another laboratory. This is a function of the vibracoring method necessary for work in deep water. However, the Navy can offer to split grab samples that will be collected from the east shoreline, the west shoreline and the reference locations. RIDEM would be requested to retrieve these samples from Tetra Tech when they are collected so that the chain of custody is not compromised. Samples split for RIDEM at Carr Point were not retrieved by RIDEM in an appropriate time frame, possibly compromising their integrity.

Be advised that the field work will begin September 21. If you have any questions, please do not hesitate to contact me at 978-474-8434.

Very truly yours,

  
Stephen S. Parker, LSP  
Project Manager

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File 112G00949-3.2  
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