



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

September 17, 2009

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

Re: Proposed Field Work Gould Island Phase II Remedial Investigation and Baseline Ecological Risk Assessment
Site 17 Building 32, Gould Island, NETC

Dear Ms. Johnson,

During the RPM meeting held on September 16, 2009 the Navy indicated that it has elected to initiate work at Gould Island prior to obtaining regulatory approval for the Phase II Remedial Investigation Work Plan. At that time the Navy stated that sampling would be limited to collection of grab and core samples for bulk chemistry only and that no other work would be conducted. Further, the location for sediment toxicity test would be based upon an analysis of the bulk chemistry results.

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. 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.

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

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, Project Manager
Office of Waste Management

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