



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203-0001

February 6, 1998

James Shafer, Remedial Project Manager
U.S. Department of the Navy
Naval Facilities Engineering Command
Northern Division
10 Industrial Highway
Code 1823, Mail Stop 82
Lester, PA 19113-2090

Re: TECHNICAL REVIEW PLAN FOR FIELD INVESTIGATION FORMER ROBERT E.
DERECKTOR SHIPYARD STILLWATER BASIN

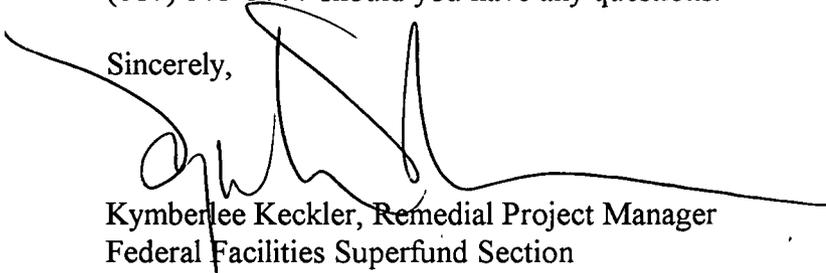
Dear Mr. Shafer

EPA reviewed the *Plan for Field Investigation for Former Robert E. Derecktor Shipyard STILLWATER Basin*, Naval Education and Training Center, Newport, Rhode Island dated January 1998. EPA evaluated the report for technical adequacy, adherence to EPA guidance, and generally accepted practice. Detailed comments are provided in Attachment A.

The placement of a reference station within an enclosure similar to the DSY-40 and DSY-41 stations should be considered. A suggested additional location is the enclosure North of station 25. It has similar bathymetry, distribution of sand in surface sediments, grain size characteristics, and depositional regime as the DSY-40 and DSY-41 stations. The attached figure indicates one suggested location. Since the suggested enclosure does not contain a historical sampling station, it is recommended *as an additional reference station* not as a replacement to the locations proposed in the plan. The other reference locations should also be sampled.

I look forward to working with you and the Rhode Island Department of Environmental Management toward the cleanup of Derecktor Shipyard. Please do not hesitate to contact me at (617) 573-5777 should you have any questions.

Sincerely,



Kimberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachments

cc: Paul Kulpa, RIDEM, Providence, RI

Kevin Coyle, NETC, Newport, RI
Susan Svirsky, USEPA, Boston, MA
Jennifer Stump, Gannet Fleming, Harrisburg, PA
Ken Finkelstein, NOAA, Boston, MA
Steven Parker, Brown & Root, Wilmington, MA
Mary Philcox, URI, Portsmouth, RI

ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. 1-3, §1.2	This section should specify that the technical memorandum deliverable will also present an evaluation of findings from this field investigation in conjunction with pertinent information from the Derecktor Shipyard Marine Ecological Risk Assessment Report and any other relevant reports in order to draw meaningful conclusions. Specifically, the technical memorandum will evaluate the effect of the basin configuration, water flows and velocities on flushing, oxygen levels, and the import of food for macroinvertebrates.
p. 2-1, §2.1	The third paragraph indicates that temperature, pH, specific conductance, dissolved oxygen and salinity will all be measured in the field using a portable water quality meter. The use of a portable meter for these parameters is the most appropriate approach given the immediate holding times of these parameters. The procedures for calibration of the field meter should be included in the plan.
p. 2-2, §2.1	The report characterizes TDS as a measure of inorganic salts and nonvolatile organics in a water sample. While dissolved solids can include the abovementioned matter, they may not be all that composes dissolved solids. Standard Methods define “solids” as matter suspended or dissolved in water or wastewater. The dissolved portion is that which filters through a 2.0 micron or smaller filter.
p. 3-3, §3.2	This text states that water samples will be collected and analyzed for dissolved oxygen to “ground truth” the continuous electronic data recorder readings. The use of a portable meter for these parameters is the most appropriate approach given the immediate holding times of these parameters. The frequency for collection of these samples is not indicated in the plan. The frequency, depth, and method for collection and analysis of water samples to verify the continuous monitoring data should be determined and included in this section.
p. 3-5, §3.4, ¶1	This section indicates that outfall water samples will be collected in a polyethylene or stainless steel bucket and then transferred into the appropriate sample containers and preserved if necessary. Samples to be analyzed for SVOCs should not be collected in any type of plastic due to the potential for phthalate contamination. Outfall water samples should be collected in a stainless steel bucket.

Table 3-2, p. 3-7

The method reference for TDS is not included in the table. Method reference EPA 160.2 should be added to the table for TDS.

Footnote (4) references the 17th Edition of Standard Methods. However, the 18th Edition is most frequently referenced and accepted for water quality projects and routine chemical methods. Reference to the 17th Edition should be verified as correct for this project.

The method reference for Fecal Coliform is listed as SM 9221B. However, SM 9221B is the method for Total Coliform determination. The correct method reference for Fecal Coliform determination is SM 9221E.

Listed methods for the bacteriological parameters all reference the 19th Edition of Standard Methods. The methods for these analyses have not been significantly changed from the 18th to the 19th Edition. However, the 19th edition has not formally been approved for typical water quality analyses. Reference to the 19th Edition should be verified as correct for this project.

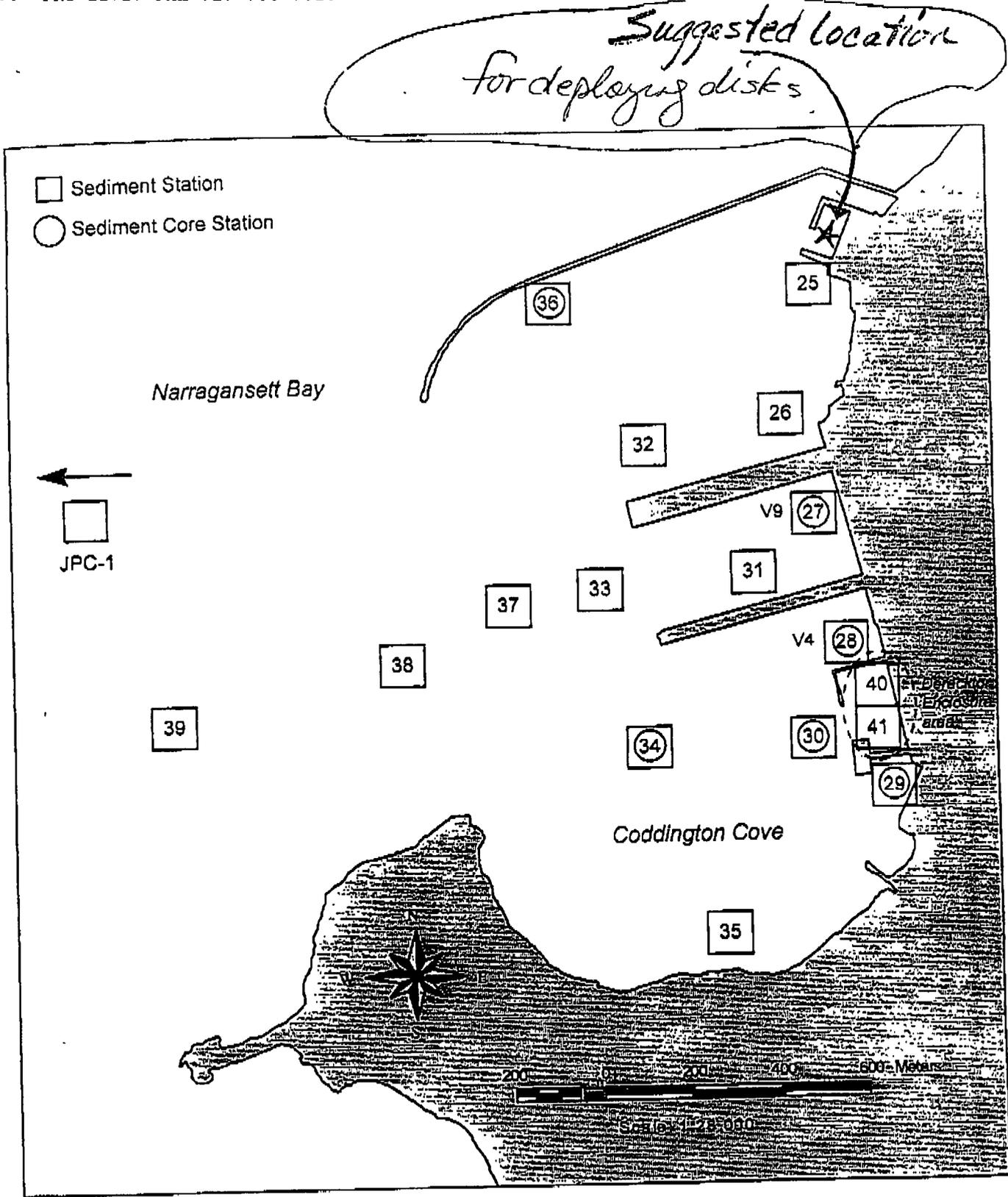


Figure 1.2-2. Surface sediment and sediment core sampling stations in the Derecktor Shipyard/Coddington Cove study area.