



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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James Shaffer, 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 19113-2090

RE: Derecktor Shipyard Building S42-1 Sump Pit Removal/PCB Removal, Naval Education and Training Center, Newport, Rhode Island

The Office has reviewed the Plan for Derecktor Shipyard removal actions dated 7 January 1997. Attached are comments generated as a result of this review.

The Office is aware that contaminate levels found at other portions of the site may warrant remedial action and this document is limited to two specific locations on the site. If the Navy has any questions concerning the above, please contact this Office at (401) 222-2797 ext 7111.

Sincerely,

Paul Kulpa, Project Manager
Office of Waste Management

cc: Warren S. Angell, DEM OWM
Richard Gottlieb, DEM OWM
Kymberlee Keckler, USEPA
Brad Wheeler, NETC

**Comments on
Derecktor Shipyard
Building S42-1 Sump Pit Removal/PCB Removal**

1. Section 4.0, Project Execution.

The Plan should stipulate that the removal actions will be photo documented and video taped. Key aspects of the project to be documented in this manner include the following; site conditions prior to removal action, visible evidence of contamination observed during the action, confirmatory sampling and site close out. In addition, the Office requests a copy of all photographs, video tapes and field notes taken during the removal actions. These items should be submitted to the Office at the end of the removal action.

2. Section 4.0, Project Execution.

The Plan should include a section which discusses regulatory notification of field activities. The notification should, at a minimum, include the following; overall project schedule, weekly schedule of field activities, and notification procedures for cancellation of field activities or changes in the project schedule (The DEM requires a seven day notice prior to the start of activities and when possible please provide a twenty four hour notification for the cancellation of field activities). Note, the Office considers project start up, confirmatory sampling and project closure as key aspects of the project.

**3. Section, 4.2.2 Sump Pit Structure Removal
Page 8.**

This section of the Plan discusses the removal of the sump pit. The Plan should stipulate that contaminated concrete will be set aside for proper disposal.

**4. Section, 4.2.3 Sump Pit Soil Removal
Page 8.**

Soil removal will continue outside of the initial excavation for soils which indicate elevated FID readings or exhibit evidence of discolorations. Once the soils have been removed confirmatory samples will be collected from the sidewalls and the floor of the excavation.

The above stipulates that confirmatory samples will be collected when there is no evidence of discoloration, elevated FID readings, and it is assumed lack of olfactory evidence. Since at this point in the excavation, the site will appear homogenous, in that there will be no field evidence of contamination, confirmatory samples should be collected from those areas which previously exhibited discoloration, elevated FID readings, etc..

**5. Section, 4.2.3 Sump Pit Soil Removal
Page 8.**

This section of the Plan indicates that confirmatory samples will be collected from the excavation. Confirmatory samples for VOCs should be collected at a minimum of 3-6 inches below the depth of the excavation.

**6. Section, 4.2.3 Sump Pit Soil Removal
Page 8.**

This section of the Plan indicates that confirmatory measures will be limited to soil samples. Please be advised that based upon activities carried out at the site it may be necessary to drill a well in this area to address potential groundwater contamination.

**7. Section, 4.2.3 Sump Pit Soil Removal
Page 8.**

This section of the Plan lists the various test methods to be employed at the site. Please be advised that the TPH method employed should be based upon the nature of the petroleum contamination. The proposed method is appropriate for fuels heavier than diesel. Lighter fuels will require an additional analysis.

**8. Section, 4.2.3 Sump Pit Soil Removal
Page 8.**

The Plan does not provide details concerning sampling collection and preservation. It is assumed that standard practices, dedicated sampling devices, preservation with ice, etc will be employed during this endeavor. In order to avoid potential confusion concerning this aspect of the project the Office recommends that these procedures be incorporated into the Work Plan.

**9. Section, 4.2.3 Sump Pit Soil Removal
Page 8.**

This section of the Plan lists the various test methods to be employed at the site. Please be advised that samples should be preserved in the field using EPA SW 846 Method 5035 (field preservations with methanol and sodium bisulfate).

**10. Section, 4.2. PCB Soil Remediation
Page 8.**

Once the staged soils have been removed confirmatory samples will be collected from the staging area.

The above contains a misprint as confirmatory samples are normal collected from the removal area not from the staging area (in this case 20 cubic yard roll offs). Please modify the Plan as follows:

Soil removal will continue in this area for soils which indicate elevated PCB field readings or discoloration. Once the soils have been removed confirmatory samples will

be collected from the sides and floor of the excavation.

**11. Section, 4.2. PCB Soil Remediation
Page 8.**

This section of the Plan indicates that a FID will be used in the screening process. A FID will have limited utility in this endeavor. Therefore, either a field GC and or PCB test kits should be employed during this phase of the removal.

**12. Section, 4.2. PCB Soil Remediation
Page 8.**

This section of the Plan indicates that confirmatory samples will be collected in the removal area. Please be advised that all potential migration pathways from the source area must be evaluated and test. The Plan should therefore include a section which outlines this evaluation and testing.