



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

March 1, 2007

James Colter, P.E.
Remedial Project Manager (Code OPNEEV)
Facilities Engineering Command, Mid-Atlantic
Naval Facilities Engineering Command
9742 Maryland Avenue
Norfolk, VA 23511-3095

3669

Re: Draft Non Time Critical Removal Action Work Plan for Derecktor Shipyard Sand
Blast Grit-Impacted Area

Dear Mr. Colter:

The Rhode Island Department of Environmental Management Office of Waste Management has review *the Draft Non Time Critical Removal Action Work Plan for Derecktor Shipyard Sand Blast Grit- Impacted Area*, Naval Station Newport, RI dated January 16, 2007. Attached are comments generated as a result of this review.

The Office of Waste Management looks forward to working with the Navy and the EPA on the remediation of this and other sites at NETC. If the Navy has any questions please contact this office at 401-222-2797 ext. 7111.

Sincerely,


Paul Kulpa

cc: Mathew DeStefano, RIDEM
Richard Gottlieb, RIDEM
Kymberlee Keckler, USEPA
Cornelia Mueller, NETC,

**Comments on the
Draft Non Time Critical Removal Action Work
for Derecktor Shipyard Sand Blast Grit-Impacted Area**

1.General Comment

Please include in the figure depicting the current conditions, location of tower, roadway, concrete wall, pipe, the area of previous removal actions, (both 2004 and 2005). In the figure depicting the 2004 removal action please include the depth, length and width of the 2005 removal action) and area of remaining impacted soils

2. General Comment

The concentration of TPH at the site exceeds regulatory requirements. Therefore, all confirmatory samples will undergo analysis for lead, TPH and SVOCs.

**3. Section 1-2 Previous Actions,
Page 1-4.**

This section deals with the removal action that was conducted in 2004 and 2005. As the work plan is public document additional information is require in order avoiding confusion. Therefore, please indicate, why were investigation samples in 2005 collected in the areas previously excavated in 2004? Why did the extent of excavation in 2005 exceed the area excavated in 2004 (the area of where the contractor inadvertently mixed the soil was reported as being limited, yet the area tested covered a large area)? The report notes that the contractor collected confirmatory samples to confirm that none of the soil remained in the excavation, yet only one confirmatory base sample is shown, and most of the investigation samples are in other locations, etc.

**4. Section 2-3 Project Communication and Reporting,
Page 1-4.**

It is understood that work plan schedules are dynamic and that the project may take more than one week to complete. Therefore, please modify this section of the report to state that at the end of each week the regulators will be given a schedule of the next weeks proposed activities so that field inspections can be performed. Please be advised that the Office of Waste Management anticipates collecting splits and/or grab samples from the test pits and from the excavated areas. In order to ensure that the regulators receive notification of when these activities are to occur either this section or Section 2.1.1, (Regulatory Notification) must specify the entity responsible for providing the one week notification prior to the start of field work and the weekly update of upcoming field activities.

**5. Section 5.6.2 Final Report,
Page 5-7.**

As a removal action report was not submitted for the previous two removal actions the final report must contain the information from all three-removal action, (2004, 2005 and ?2007?). This information must include the length, width and depth of each removal action the location of all confirmatory samples, tables with confirmatory sample results, bills of laden for each action, final disposal location for contaminated soil, cost of each action, etc.