



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

26 February 2008

Michael Healy
Charbert-Division of NFA Corporate Facility
299 Church Street
Richmond, RI 02894

RE: Remedial Action Work Plan dated October 2007;
Phase II Bedrock Aquifer Evaluation Work Plan /
Phase IV Subsurface Investigation Program
Charbert, a Division of NFA Corporate Facility
Alton, RI

Dear Mr. Healy:

The Rhode Island Department of Environmental Management (the Department), Office of Waste Management (OWM) has conducted a review of the above referenced documents for the Charbert, Division of NFA Corporate Facility (Charbert) located on 299 Church Street in Alton, RI. As a result of this review, the OWM has generated the attached comments.

If you have any questions please contact me at (401) 222 – 2797, extension 7514 or by e-mail at joan.taylor@dem.ri.gov.

Sincerely,

Joan Taylor, Senior Environmental Scientist
Office of Waste Management

cc: Matthew DeStefano - RIDEM
David Chopy - RIDEM
Cynthia Gianfrancesco - RIDEM
Ed Summerly - GZA
Mary Morgan - Town of Richmond
Clark Memorial Library - Charbert Repository

**Charbert, Division of NFA Corp
Alton, RI**

**Office of Waste Management Comments Remedial Action Work Plan (RAWP)
dated October 2007:**

General Comments:

- 1 On 10 October 2007 the OWM verbally requested additional detail on Closure of Lagoon 5. As of this date, OWM had not received the additional detail that was requested. Please provide details regarding dewatering procedures, handling and storage of contaminated sediment, erosion controls, etc.

Specific Comments:

2. Page 13, Section 4.22, Groundwater, Paragraph 1:

“A groundwater residual zone will be established between the identified source areas and the compliance boundaries.”

The OWM wishes to clarify that Charbert must make every effort to achieve RI GA Groundwater Objectives throughout the entire site. In the event that, after making every effort, Charbert is unable to achieve RI GA Groundwater Objectives through out the entire site, Charbert may apply for a groundwater residual zone through the Office of Water Resources, which if approved, may be granted by the Department. Until that time, Charbert should proceed with the assumption that RI GA Groundwater Objectives will be met.

3. Page 21, Section 5.07, Soil Stockpile Reuse:
Page 22, Section 5.08, ISDS Cross Connection:

The soil stockpiles, and sewer lines and industrial wastewater collection system must be reviewed by the appropriate Department programs, that being the Underground Injection Control and Individual Septic Disposal System programs respectively. For this reason, the OWM is not including the soil stockpiles, sewer lines and industrial wastewater collection system as part of the RAWP review. Charbert must apply to the applicable programs for approval of those tasks.

4. Page 24, Section 5.13, Environmental Monitoring:

“The environmental monitoring plan will be submitted for RIDEM’s review following completion of the bedrock aquifer assessment ”.

In accordance with Item D of the SIR, Charbert has proposed to implement a monitoring program as part of the RAWP, however, the RAWP indicates that an environmental monitoring plan will not be implemented until after the bedrock aquifer assessment is completed. As discussed during a meeting on 10 December 2007, the OWM does not concur with this schedule and requires that a site-wide Interim Environmental Monitoring Plan be implemented prior to issuance of a Remedial Approval Letter for the overburden RAWP and in conjunction with shutdown of the Charbert facility. We believe this is necessary in order to monitor changes in the aquifer after the production wells and lagoons are no longer in use. Please be advised that the Interim Compliance Monitoring Plan for Source Control Remedy dated 4 December 2007, which was specifically designed to monitor Soil Vapor Extraction/Air Sparge remedial system, may be a component of the required monitoring plan but does not meet the requirements for a site wide monitoring plan. See *Phase II Bedrock Aquifer Evaluation Work Plan / Phase IV Subsurface Investigation Program* Specific Comment C below.

5. Page 25, Section 6.00, Contingency Plan:

In accordance with Rule 9.13 of the RI Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases (the Remediation Regulations), the Contingency Plan must clearly explain the procedures to be followed and the persons to be notified in the event of an unexpected incident involving hazardous materials at the site. Section 6.00 of the RAWP did not clearly explain the procedures to be followed in the event of an emergency involving hazardous materials. The Contingency Plan must contain a section that outlines all emergency response procedures and arrangements. In addition, the Contingency Plan should include contact information for RIDEM's Emergency Response Section.

6. Page 26, Section 8.00, Compliance Determination:

The RAWP must include a section outlining the procedures to be employed in order to demonstrate that the remedial objectives for each remedial action outlined in Section 5.00 have been met. This does not appear to be clearly defined in the RAWP.

7. Page 27, Section 10.00, Project Schedule:

Charbert must submit a revised/updated Project Schedule.

Office of Waste Management Comments *Phase II Bedrock Aquifer Evaluation Work Plan / Phase IV Subsurface Investigation Program*

General Comments.

- A. Because the monitoring plan and the *Phase II Bedrock Aquifer Evaluation Work Plan / Phase IV Subsurface Investigation Program* were submitted in the same document, OWM's comments stated herein apply only to portions of the document that address overburden monitoring. Comments pertaining to the bedrock aquifer investigation will be addressed in a separate response.
- B. In the cover letter accompanying the Interim Compliance Monitoring Plan for Source Control Remedy dated 4 December 2007, the monitoring plan is referred to as the Interim Compliance Monitoring Plan (CMP). In the *Phase II Bedrock Aquifer Evaluation Work Plan / Phase IV Subsurface Investigation Program* dated 29 January 2008, page 4 of the Comprehensive Groundwater Sampling and Analysis section, the monitoring plan is referred to as the Interim Environmental Compliance and Monitoring Plan (IEMP). It is not clear whether the CMP and the IEMP are the same document. In order to facilitate review, please ensure that the consistent terminology is used throughout the document(s).

Specific Comments:

- C. Page 3, Task 1 - Data Collection and Evaluation:

Under Task 1, the overburden groundwater gauging proposed in the Piezometric Monitoring section appears adequate. However, the analytical sampling for VOCs proposed in the Comprehensive Groundwater Sampling and Analysis section indicates that analysis will not take place until June 2008. As stated in Comment 4 above, OWM does not believe the lack of analytical sampling is acceptable and requires that a site-wide Interim Environmental Monitoring Plan, to include analytical sampling, be implemented prior to issuance of a Remedial Approval Letter for the overburden RAWP and in conjunction with shutdown of the Charbert facility. We believe this is necessary in order to monitor changes in contaminant levels in the aquifer after the production wells and lagoons are no longer in use. OWM requires that analysis begin within 2 weeks after shutdown of the Charbert facility and continue at 2 week intervals until groundwater reaches a natural or recovered state, at which time Charbert can propose an alternative frequency. OWM recommends that analysis be conducted prior to shut down to establish base line conditions. Please submit a revised monitoring proposal, to include analytical parameters, the number, location and justification of monitoring wells to be monitored in the plan.