



RHODE ISLAND

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

March 27, 2018

CPT Erik Patton  
U.S. Army Corps of Engineers  
New England District  
696 Virginia Road  
Concord, Massachusetts 01742

RE: Remedial Investigation Quality Insurance Plan  
Gould Island Site, Narragansett Bay  
Jamestown, Rhode Island

Dear CPT Patton:

The Office of Waste Management (OWM) at the Rhode Island Department of Environmental Management has conducted a review of the *Remedial Investigation Quality Assurance Project Plan* for Gould Island, located in Jamestown, Rhode Island. As a result of this review, this Office has generated the attached comments on the RI QAPP.

Please be advised that this letter does not signify RIDEM concurrence that the proposed remedial investigation is sufficient to close out any identified areas of concern (AOCs) at the site. Any decision on the adequacy of the AOC investigations will be made after the results from this remedial investigation and any other relevant information have been evaluated.

If you have any questions, in regards to this letter, please contact me at (401) 222-2797, extension 7517 or by e-mail at [nicholas.noons@dem.ri.gov](mailto:nicholas.noons@dem.ri.gov).

Sincerely,

A handwritten signature in cursive script that reads "Nicholas J. Noons".

Nicholas J. Noons  
Sanitary Engineer  
Office of Waste Management

cc: Matthew DeStefano, RIDEM/OWM  
Shawn Lowry, RIDEM/OWM  
Sean McNamara, Credere Associates  
Allison Drouin, Credere Associates

RIDEM Comments (3/27/2018) on the  
*Remedial Investigation Quality Assurance Project Plan*  
Gould Island, Narragansett Bay  
Jamestown, Rhode Island

**General Comments**

1. Please be advised that the Department requires does not recognize composite sampling, including incremental sampling methodology (ISM), for the purposes of assessing the nature and extent of contamination. As such, in areas where initial composite sampling is proposed (e.g. aviation pad, coal storage areas, bunkers, etc.), subsequent discrete sampling may be required to adequately assess the nature and extent.
2. The RI QAPP proposes 10 samples be collected “to evaluate background concentrations of arsenic for comparison to other areas of the Site in the risk assessment.” Please be advised that any background determination for arsenic must be consistent with Section 12 of the Remediation Regulations.
3. Perfluoroalkyl substances (PFAS) have been detected on the northern portion of Gould Island, including in an upgradient monitoring well installed by the Navy on State-owned property. Gould Island is classified as a GA Groundwater aquifer and the Department has adopted the EPA Health Advisory of 70 ng/L (ppt) for the combined concentration of perfluorooctanoic acid (PFOA) and perfluorooctanesulfonic acid (PFOS) for groundwater classified as GAA and GA. As such, analysis for PFAS should be conducted where prior use, storage, and/or disposal of these compounds is suspected

**Specific Comments**

1. **Page 57, Soil and Concrete, NED Sites Nos. 21 and 22 – Bunkers #11 and 12.** Grab samples at these sites are contingent on debris removal and safe access. If this is not achieved, please indicate how these areas will be characterized.
2. **Page 59, Soil and Concrete, NED Site No. 38 – Torpedo Storage #10.** As this building is known to have stored torpedoes, soil samples should be collected in and/or around the building to analyze for explosives.
3. **Page 61, Groundwater.** Please add PFAS analysis to the following suspect areas:
  - a. NED Site No. 10 – Disposal Area #14
  - b. NED Site No. 12 – Maintenance Shop/Garage/Fire Station #39
  - c. NED Site Nos. 27 & 31 – Gas Pits
  - d. NED Site No. 30 – Pyrotechnics Storage
  - e. NED Site No. 42 – 5000-gallon Tank (Av Gas)