



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

12 April 2006

Edward Summerly
GZA GeoEnvironmental, Inc.
140 Broadway
Providence, Rhode Island 02908

RE: Bedrock Aquifer Evaluation Work Plan
Charbert, a Division of NFA Corporation
299 Church Street
Alton, RI

Dear Mr. Summerly:

The Office of Waste Management (OWM) has conducted a review of the Bedrock Aquifer Evaluation Work Plan dated 15 March 2006 for the Charbert, a Division of NFA Corporation (Charbert) facility 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: David Chopy - RIDEM
Cynthia Gianfrancesco - RIDEM
Richard Amirault - RIDOH
Mary Morgan, Richmond Town Hall
Clark Memorial Library - Charbert Repository
Michael Healy - Charbert- Division NFA



**Charbert, Division of NFA Corporate Facility
Alton, Rhode Island**

Bedrock Aquifer Evaluation Work Plan

Office of Waste Management Comments:

GENERAL COMMENTS:

1. RIDEM feels that the procedures and methods proposed to characterize the type and physical condition of bedrock underlying the Site and to evaluate the nature and extent of chemical contaminants within bedrock, if any, is acceptable. If after developing and sampling monitoring wells, elevated levels of chlorinated compounds persist in groundwater, additional investigation, including the installation of additional monitoring wells, may be required.

SPECIFIC COMMENTS:

1. Page 4, Task 2 – Drilling Program:

RIDEM must ensure that any investigative method employed during field studies at the Site is protective of human health and the environment. RIDEM believes that the proposed method of borehole advancement described in this section is not sufficient to minimize the potential for the downward migration of DNAPL, if present, from the overburden to the bedrock aquifer. Upon completion of each borehole, and in the event that detectible levels of chlorinated solvents are found in the bedrock aquifer, RIDEM recommends the installation of a stainless steel sump in each borehole.

2. Page 4, Task 2 – Drilling Program, Paragraph 3
Page 6, Task 4 – Monitoring Well Installation Procedures, Paragraph 1:

“No rock cores will be recovered using this method; as such, an extensive in-situ bedrock testing program has been developed as presented below.”

“The geophysical data will be used in conjunction with rock core samples, permeability test results and chemical testing data to select the most appropriate depths for the placement of well screens/sampling zone within the bedrock boreholes.”

On Page 4, the narrative states that no rock cores will be recovered. On Page 6, the narrative states that rock core samples will be used in conjunction with other data to select the most appropriate depths for the placement of well screens/sampling zone within the bedrock boreholes.

Please resolve this apparent discrepancy and clearly state whether or not rock cores will be recovered for use in conjunction with other data to select the most appropriate depths for the placement of well screens/sampling zone within the bedrock boreholes.