

May 3, 2006
File No. 32795.12-C



Ms. Joan Taylor
Rhode Island Department of Environmental Management
Office of Waste Management
235 Promenade Street
Providence, Rhode Island 02908-5767

Re: Responses to RIDEM's 12 April 2006 Comments
Bedrock Aquifer Evaluation Work Plan
Charbert Facility, Richmond, Rhode Island

Dear Ms. Taylor:

This letter provides responses to the comments provided in your April 12, 2006 letter concerning the March 15, 2006 *Bedrock Aquifer Evaluation Work Plan* prepared by GZA GeoEnvironmental, Inc. on behalf of Charbert, a Division of N.F.A. Corp. For convenience we have included your comments and provided our responses in italics below. Where work plan modifications were requested we have updated the Phase II Work Plan and attached it for your review and approval.

GENERAL COMMENTS

Comment No. 1:

RIDEM feels that the procedures and methods proposed to characterize the type and physical condition of the 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.

GZA's Response to Comment No. 1:

Acknowledged.



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SPECIFIC COMMENTS

Comment No. 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 overburn to the bedrock aquifer. Upon completion of each borehole, and in the event that detectable levels of chlorinated solvents are found in the bedrock aquifer, RIDEM recommends the installation of a stainless steel sump in each borehole.

GZA's Response to Comment No. 1:

Accepted, immediately following drilling each borehole, a stainless-steel sump will be installed at the base of the borehole. Each sump will consist of 4 foot long by 2 inch ID stainless steel tube with a welded end cap. The boreholes will be over-drilled a depth of 4 feet (i.e., to a total depth of 204 feet) to accommodate the sumps. Sumps will be fitted with a mechanical top packer and a bentonite grout seal will be placed around the annulus between the tube and the borehole wall. The drill rods will be used to push the sump into place following the completion of bedrock drilling.

The purpose of the sump is to contain DNAPL, if present, and prevent its further downward migration. The sump will also allow for the measurement and recovery of DNAPL from the borehole if it is encountered. Reading of DNAPL, if present, will be obtained periodically throughout the in-situ testing program using an ORS Oil/Water interface probe, or equivalent.

We have employed these methods at other Sites with similar bedrock conditions.

Comment No. 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 borholes.

GZA's Response to Comment No. 1:

No rock cores will be collected as part of the proposed program. We recommend the use of air-percussion drilling methods to speed the progress and reduce the exploration costs. This will be followed by and extensive suite of geophysical testing that will yield more pertinent hydrogeologic information than would the examination of rock cores.

PROJECT SCHEDULE

As requested in your email of April 17, 2006 we have prepared a tentative schedule for the completion of the studies described in the Work Plan.

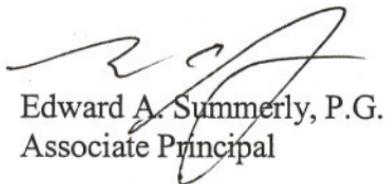
Task	Schedule
Surficial Geophysical Survey	May 8 to June 2, 2006
Technical Memorandum #1 for Drilling Location Recommendations	June 2 to June 23, 2006
<i>RIDEM Review/Approval of Drilling Locations</i>	June 23 to July 14, 2006
Mobilization and Drilling of 3 Bedrock Boreholes	July 28 to August 25, 2006
Borehole Geophysical Logging	August 25 to September 8, 2006
Technical Memorandum #2 for Well Screen Placement Recommendations	September 8 to September 29, 2006
<i>RIDEM Review/Approval of Well Installations</i>	September 29 to October 20, 2006
Order Well Equipment and Complete Well Installations	October 20 to December 1, 2006
Sampling and Analysis of Monitoring Wells	December 1 to December 22, 2006
Evaluate Subsurface Conditions/Analytical Results and Prepare Supplemental SI Report	December 22 February 2, 2007

Note, that this schedule is dependant upon a number of factors beyond GZA's control including, the available of contractors, weather and review time by others. We will keep you apprized of any changes in the schedule as the work proceeds.

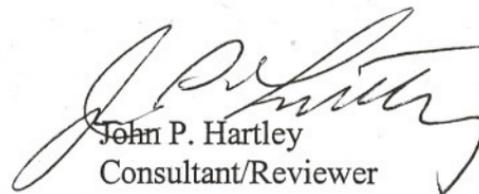
We trust this information addresses your comments and understand that we have RIDEM's authorization to proceed with the surficial geophysical surveys. Please feel free to contact me with any questions or comments.

Very truly yours,

GZA GEOENVIRONMENTAL, INC.



Edward A. Summerly, P.G.
Associate Principal



John P. Hartley
Consultant/Reviewer

EAS:mac

cc: Cynthia Gianfrancesco, RIDEM
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