



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

9 September 2005

Ed Summerly
GZA GeoEnvironmental, Inc.
140 Broadway
Providence, Rhode Island 02903

Re: Charbert, Division of NFA
Phase II Site Investigation Response to Comments
Prepared by GZA dated 18 August 2005

Dear Mr. Summerly;

The Rhode Island Department of Environmental Management, Office of Waste Management (Department) has conducted a review of the above referenced document regarding the Charbert facility in Alton, Rhode Island. As a result of this review, the Department finds that the responses to comments are satisfactory with the exception of the attached two comments. Please provide the RIDEM with a response to these comments as soon as possible. Upon receipt of a satisfactory response to these comments and the data required to fulfill these supplemental investigations RIDEM shall issue an Interim Program Letter (IPL) for the overburden portion of the site investigation. Within 30 days of the Respondents receipt of the IPL on the Site Investigation Report (SIR), the Respondent shall publish/provide public notice of availability of the SIR and a 30-day public comment period as noted in the Consent Agreement (CA). Upon satisfactory response to any public comments received, the RIDEM issue an Interim Remedial Decision Letter (IRDL) for the overburden portion of the site investigation.

The CA also states that within thirty days following RIDEM approval of the SIR (issuance of the IRDL), the Respondent shall submit a proposal to RIDEM that includes a bedrock aquifer investigation. This investigation must characterize any contaminants present in the bedrock aquifer that are related to the site based on the findings and results of the SIR. As such, RIDEM requires that, in accordance with the Consent Agreement, a bedrock aquifer investigation work plan be submitted within 30 days of the RIDEMs issuance of the Interim Remedial Decision Letter. Please be advised that RIDEM shall only issue a final remedial action approval for the entire site after satisfactory completion of the bedrock aquifer investigation and, if necessary, bedrock aquifer remedial action.

We look forward to continuing to work with you to address these issues as we move forward. If you have any questions or require additional information please call me at my telephone (401) 222-2797 ext. 7150 or by e-mail at jill.eastman@dem.ri.gov

Sincerely,



Jill Eastman
Environmental Scientist
Office of Waste Management

Cc: M. DeStefano, RIDEM-OWM
C. Gianfrancesco, RIDEM-OWM ✓
D. Chopy, RIDEM-OCI
M. Healy, Charbert
M. Morgan, Richmond Town Council
Clark Memorial Library Repository

Comments to June 2005 Charbert Phase II Site Investigation

RIDEM's Comment No. 13

Section 2.80-Sanitary Sewer System, Page 9- This section does not clarify whether the 'colored water' was similar to the purple tinted water found in previous groundwater samples collected from RIZ-14. If they were similar, please provide information on RIZ-14 and potential impact from the lagoons or both the lagoons and the failed Individual Sewage and Disposal System (ISDS). This section states that tinted water originated from the dye room. Please provide information regarding reporting this incident to either the Underground Injection Control (UIC) or ISDS departments.

Complete an investigation of this potential source area (former leach field and associated piping) to determine if groundwater contamination is coming from the lagoons/process water or the leach field and/or it's associated piping.

GZA's Response to Comment No. 13

Charbert personnel are continuing to evaluate the source of the colored water. Once the source has been determined, it will be rerouted to the waste waster handling system and RIDEM will be notified. Regarding prior notifications, the notification that was given was to the Office of Waste Management via the Site Investigations report.

Note, however, that the former leaching field had not failed (i.e., septage waste visible at ground surface), but had deteriorated to the point that maintenance of the beds was needed. As you will recall Charbert elected to relocate the leaching field to provide additional distance between the ISDS and adjacent residents.

An investigation of the old leach field and associated piping will be conducted by GZA. The three old galleys will be opened and a soil sample will be removed from beneath the leach field material in each. The samples will be characterized by the following laboratory analysis:

Semi-volatiles via 8270 with TICs
Volatiles via 8260
TPH/Fingerprint via 8100
PP-13 Metals

The results will be compared to the results of the stockpiled soils from prior lagoon scraping activities that were extensively characterized. Our rationale in selecting this avenue of evaluation is that the soils in the leach field are above the groundwater table, and therefore should not contain constituents similar to the soil stockpiles, unless process wastewater has been released to them.

If this investigation provides evidence of industrial wastewater discharge to the old ISDS system we will evaluate the need to conduct a visual inspection of the associated piping between the facility and the leaching field using a pipe inspection camera.

RIDEM's 2nd Response to Comment No. 13

In addition to comparing sample results to stockpiled soil, the leach field samples must also be compared to RIDEM Direct Exposure Criteria and GA Leachability Criteria.

RIDEM's Comment No. 15

Section 2.11.1-Underground Storage Tanks, Page 11- Due to the fact that no confirmatory soil samples were collected during the removal of the waste oil tank, please be advised that further investigation of this area is necessary.

GZA's Response to Comment No. 15

Test results from groundwater and soil in this area (i.e. GZ-6, RIZ-3, CB-4 and CB-9) do not suggest the presence of significant petroleum release from these two tanks. The tank graves are currently covered by a concrete waste oil bunker (labeled as "Southwest Bunker Oil Storage Area"). We feel it is not prudent to compromise the integrity of the bunkered area. We will revise Section 2.11.1 to reflect this information.

RIDEM'S 2nd Response to Comment No. 15

GZ-6 soils were sampled at 38 -40 ft and 44 -45 ft below ground surface (bgs). Surficial soil PID readings ranged from 7-3 lppm from 1-6 ft bgs, but no samples from this overburden area were collected. RIDEM agrees that it is not prudent to collect samples from under the concrete at this time. However, because the PID readings above the groundwater table (6.5 ft bgs) were significant the Department feels that limited sampling around the concrete is necessary. At a minimum, two samples (1-3 ft & 3-6.5 ft) from each of two borings (4 samples total) should be collected from the western and southern edge of the concrete bunker within the former UST area. Samples should be analyzed for VOCs, TPH and SVOCs.