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LETTER AND U S NAVY RESPONSE TO RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT COMMENTS REGARDING DRAFT SAMPLING AND ANALYSIS PLAN FOR SITE 19 FORMER DERECKTOR SHIPYARD NS NEWPORT RI
08/08/2011
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C-NAVY-08-11-4522W

August 8, 2011

Project Number 112G02747

Ms. Pamela Crump, Remedial Project Manager
Office Of Waste Management
Rhode Island Department of Environmental Management
235 Promenade Street
Providence RI, 02908-5767

Reference: CLEAN Contract No. N62470-08-D-1001
Contract Task Order No. WE61

Subject: Responses to Comments
Draft Sampling and Analysis Plan, IR Site 19, Former Derecktor Shipyard (Offshore),
Naval Station Newport, Newport RI

Dear Ms. Crump:

On behalf of Ms. Winoma Johnson, US Navy NAVFAC Mid-Atlantic, and based on our discussions held July 20, I am providing to you attached the response to comments on your letter dated July 18, 2011 regarding the UFP SAP for the off-shore portions of Site 19 (May 2011). Based on these responses, the Sampling and Analysis Plan will be revised and published with the intention of beginning field work prior to the end of August.

If you have any questions, please do not hesitate to contact me at 978-474-8434.

Very truly yours,

Stephen S. Parker, LSP
Project Manager

Enclosures

c: D. Barclift, NAVFAC (w/encl.)
K. Finkelstein, NOAA (w/encl.)
A. Gavaskar, NAVFAC (w/encl.)
G. Glenn, TtNUS (w/o encl.)
K. Keckler, (w/encl.)
W. Johnson, NAVFAC (w/encl.)
K. Munney, USF&W (w/encl.)
P. Steinberg, Mabbett Associates (w/encl.)
D. Ward, NAVSTA (w/encl.)
Site File (c/o G. Wagner TtNUS (w/encl.)
File 112G02747-8.0 (w/encl.), 3.1 (w/o encl.)

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Response to Comments From RIDEM
Sampling and Analysis Plan for the Data Gaps Investigation
Site 19, Former Derecktor Shipyard Marine Sediment, NETC
Comments Dated 7/18/11

1. ***Page 13, Worksheet #6, Communication Pathways.***

   Please add the appropriate language to this table that states if any change to the Final SAP is proposed by the Navy, the Navy will submit the proposed changes to the regulatory agencies for review and approval before the work is executed.

Response: The requested revision will be made.

2. ***Page 30, Section 10.5.3, Development of Cleanup Goals (PRGs); 2nd paragraph.***

   "The RPRGs were finalized as cleanup criteria for marine sediment at Site 19."

   Please be advised that RIDEM has not concurred with the RPRGs due to many issues as explained in the letter to the Navy dated January 2, 2009. As you are aware, the PRGs are never finalized as cleanup criteria until the ROD has been issued at a CERCLA Site. To date a ROD and an FS has not been finalized for this site, and this SAP is being proposed for further investigation for this site, therefore please change the language in this SAP.

Response: The comment is made in regards to the PRG document which is a final document. The final PRGs are referenced in the SAP as is appropriate. The team agreed to move forward with the approach for the data gaps investigation discussed at the planning meetings which were attended by RIDEM, particularly that held October 2010.

3. ***Page 30, Section 10.5.3, Development of Cleanup Goals (PRGs); Limiting COCs.***

   Zinc and copper were identified as ecological risk drivers at this site in previous documents. Tributyltin was found at concentrations indicative of an unacceptable risk. Sources of asbestos have also been identified in recent studies. Therefore, please modify this section to include zinc, copper, tributyltin and asbestos as COCs for which PRGs could be developed for the site. Also, please add to this table how many times greater than the HQ=1 each RPRG listed is equal to.

Response: The text is correct as presented. The information regarding the RPRGs and HQs is presented in the PRG document, and is not needed in the SAP.

4. ***Page 30, Section 10.5.3, Development of Cleanup Goals (PRGs); whole section.***

   As noted in previous meetings and correspondence, this Office does not concur with a value equal to ten times the hazard quotient as being an acceptable human health PRG for

benzo(a)pyrene. While a value equal or close to this may ultimately be determined to be acceptable for delineating areas to be actively remediated, values below the ten times HQ may be subject to alternate remedial measures such as monitoring. Please modify this SAP accordingly.

Response: The comment is made in regards to the PRG document which is a final document. The final PRGs are referenced in the SAP as is appropriate. The team agreed to move forward with the approach for the data gaps investigation discussed at the planning meetings which were attended by RIDEM, particularly that held October 2010.

5. *Page 33, Section 11.1, Problem Statement; 5th bullet.*

This bullet deals with an investigation to ascertain whether sediments are disturbed under normal and extreme conditions. It is not clear to this Office why this study is necessary due to the fact that during historical ship traffic in the area, observations have been made by the Navy and RIDEM in the field that demonstrated sediments were disturbed and redistributed at the site. Please remove this study from the SAP.

Response: The physical sediment study elements are included to evaluate the possibility of resuspension and redistribution of sediments and contaminants, a concern that RIDEM has had at this site since the FS was originally drafted. Only by defining the possibility of this occurrence can the remedial action address it. The team agreed to move forward with the approach for the data gaps investigation discussed at the planning meetings which were attended by RIDEM, particularly that held October 2010. As discussed at the July 20, 2011 RPM meeting, EPA is in agreement with this portion of the investigation.

6. *Page 34, Section 11.2, Field Observations and Measurements; 4th and 5th bullets.*

This SAP proposes to conduct a study to determine current flow direction and wave height that will be deployed at the site for a period of 15 days. Previous studies have already been performed in the ecological risk assessment in regards to current flow direction at this site. In regards to wave height, a 15-day study is not long enough to determine what the normal wave height at the site is. Such a study would have to entail sampling for an extended period of time during the different seasons. Please remove the current flow study and short duration wave height test proposed in this SAP.

Response: Wave height is only one of several measurements made by the ADCP deployments. It is recognized that higher wave heights can be encountered in the study area during storm seasons. Information gathered will be utilized to the extent possible. As discussed at the July 20, 2011 RPM meeting, EPA is in agreement with this portion of the investigation.

7. ***Page 36, Section 11.2, Fixed Laboratory Chemical Data and Project Action Limits; 2nd paragraph.***

This SAP proposes having NDs with LODs above the PALs as being considered below the PAL. If the LOD is above the PAL, then the reported concentration must be considered equal to the value of the LOD. Please modify this SAP accordingly.

Response The section will be revised to state "non detected results with associated LOD values greater than the PAL will be considered a data gap, and will be addressed as such." The next sentence of the passage discusses how sensitivity goals are evaluated.

8. ***Page 37, Section 11.4, Analytical Approach; 2nd paragraph.***

"If all newly-acquired target analyte concentrations in the site sediment are less than the associated PALs (discussed in Section 11.2), then the team will recommend no further investigation or remedial action."

The purpose of this Data Gaps Investigation is to determine the extent of contamination to be remediated. Based upon past studies, an unacceptable risk has been identified at the site which requires a remedial action. Please remove this sentence from this SAP, and include a statement that all previous data will be included in the assessment of contamination distribution at the site.

Response: The text is correct as stated. If no sediments exceed the PALs, there would be no remedial action. Regarding previously collected data, refer to the response to comment no. 9, below.

9. ***Page 37, Section 11.4, Analytical Approach; whole section.***

Please incorporate the previous collected data with the proposed sampling results to this section.

Response: The text will be revised to state that previously collected data were used to aid in the selection of sample stations for this SAP, and will also be considered while evaluating new data. Refer to comment 12 below.

10. ***Page 38, Section 11.4, Analytical Approach; 2nd-4th bullets.***

Independent of the current proposed SAP, these contaminants must be carried forth through the FS. Please remove these bullets from this SAP as the cited contaminants have been identified as representing an unacceptable risk which will require action if exceedances are observed either from past sampling or the current sampling event.

Response: The determination as to whether these contaminants will be carried forward will be made in the Data Gaps Investigation Report, based on the decision criteria provided in the SAP. The bullets reflect the agreements made, and will remain.

11. ***Page 38, Section 11.4, Analytical Approach; 1st paragraph.***

This section states that the Project Team will evaluate remedial alternatives for a FS. A FS has already been conducted at the site which includes remedial alternatives which ranged from dredging to capping. It is not clear why there is a need to develop alternatives for the FS, unless there is a new innovative technology which can be used to remediate sediments that has been developed since the FS was drafted. Please revise this section accordingly.

Response: The team has agreed to collect additional data in order to evaluate appropriate response action for this site. As a result, the FS may undergo a revision as a result of the new data collected, showing the current conditions of the site.

12. ***Page 41, Worksheet #13, Secondary Data Criteria and Limitations Table.***

"Data collected during previous investigations were only used to aid in the selection of sample locations for this SAP. Previously collected data will not be used in the development of the FS for the DSY."

Please remove these two sentences from this worksheet. Previously collected data will be used along with any new data in the development of the revised FS for DSY.

Response: Previously collected analytical data is a matter of record and is the basis for the risk calculated and will therefore be included in the FS as historical information. However, based on the concerns raised by all parties attending the planning meetings in regards to the representativeness of the previous data coverage, and because of the possibility of sediment scouring and movement, it is expected that the extent of COCs exceeding PRGs will be revised using the new data and not the old data. For clarity, the text will be revised to state that previously collected data were used to aid in the selection of sample stations for this SAP, and will also be considered while evaluating new data.

13. ***Page 46, Section 14.4, Project Report.***

This SAP notes that the results will be compared to the BPRGs and RPRGs. This SAP should also specify that the results from analytes, such as PAHs which do not have PRGs, will also be included in tables in the Data Gaps Investigation report. Please modify this SAP to include this provision.

Response: The text is correct as written. Constituents that are not described in worksheet 15 are not going to be analyzed or evaluated as a part of the Data Gaps Investigation.

14. ***Pages 48-52, Worksheet #15, Reference Limits and Evaluation Table.***

This Office does not concur with the use of the RPRG as the PAL for any contaminant. Please replace the PALs with the BPRGs for benzo(a)pyrene, total HMW PAHs, and total PCBs.

Response: The Navy is moving forward with the approach agreed to at the Planning meetings which were attended by RIDEM, particularly that held October 2010. The use of the RPRGs as PALs is appropriate for this effort. The LODs are well below these PAL levels, and will provide lower concentration data if that is the concern.

15. ***Page 53, Worksheet #16, Project Schedule/Timeline Table.***

Please add the following language to this worksheet: "The regulatory agencies will be provided with a weekly schedule of upcoming field work, a weekly summary of work completed or ongoing, and must provide 48 hours notice for any field work commencements and cancellations."

Response: The requested revision will be made.

16. ***Figure 10-3, Points of Interest.***

Building 234 is labeled as Building 254. Please correct.

Response: The requested revision will be made.

17. ***Figure 11-1, Sample Distribution.***

There are a number of potential sources of contamination along the bulkhead of the wharf (i.e., discharge pipes associated with the former Derecktor Shipyard). Please indicate on this figure the locations of any outfall pipes including storm drain outfalls. Also, please adjust the sampling grid so that samples are collected adjacent to these discharge points.

Response: The selected density of the sample grid along the waterfront where the outfalls are, or were, is appropriate for the location of contaminants present, and sampling directly under outfalls where dispersion and sediment suspension is possible is not necessary.

18. ***Figure 11-1, Sample Distribution.***

Please include zinc and copper analysis at all sampling stations as these contaminants were identified as ecological risk drivers at the site.

Response: The team agreed to move forward with the approach for the data gaps investigation discussed at the planning meetings which were attended by RIDEM, particularly that held October 2010. The inclusion of zinc and copper was agreed to in areas where a) the Corps of Engineers previously (prior to 1995) found elevated levels of these metals, b) under the piers, and c) in areas where the two aircraft carriers have been moored.

19. ***Figure 11-1, Sample Distribution.***

Please include sampling stations at the end of Piers 1 and 2 to show the extent of contamination in these areas.

Response: The Navy will agree to add one location at grid cell G-1, at the westernmost extremity of Pier 2 as requested, and will include zinc and copper analysis. At Pier 1, a sample is already proposed at grid cell AA-1, which includes zinc and copper analysis. SD-101, collected in 2004 also included zinc and copper analysis, was collected at the western extremity of Pier 1 and sediment there was found to be below PRGs. Therefore additional samples at the western end of Pier 1 are not necessary.

20. ***Figure 11-1, Sample Distribution.***

Based on the high hazard quotient values for benzo(a)pyrene, please collect additional samples at the following stations: DSY-6,-8,-19,-26, and -32.

Response: The team agreed to move forward with the approach for the data gaps investigation discussed at the planning meetings which were attended by RIDEM, particularly that held October 2010. A station planned near DSY 8 was inadvertently left off, and will be added. A station near DSY-6 is already planned as shown on Figure 11-1. Samples at formers stations DSY 19, 26, and 32 were not identified as a data gap during the planning meetings