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RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT COMMENTS TO  
DRAFT FEASIBILITY STUDY SITE 8 WITH TRANSMITTAL NS NEWPORT RI  
10/18/2010  
RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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RHODE ISLAND

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

18 October 2010

Edward Corack, P.E.  
NAVFAC MIDLANT (Code OPTE3)  
Environmental Restoration  
Building Z 144, Room 109  
9742 Maryland Avenue  
Norfolk, VA 23511-3095

RE: Draft Feasibility Study  
Naval Undersea Systems Center Disposal Area (Site 08)  
Naval Station Newport, Newport, Rhode Island

Dear Mr. Corack:

The Office of Waste Management at the Rhode Island Department of Environmental Management has conducted a review of the *Draft Feasibility Study*, dated August 2010 for Naval Undersea Systems Center Disposal Area (Site 08), Naval Station Newport, located in Newport, Rhode Island. As a result of this review, this Office has generated the attached comments on the *Draft Feasibility Study*.

If you have any questions, in regards to this letter, please contact me at (401) 222-2797, extension 7148 or by e-mail at [gary.jablonski@dem.ri.gov](mailto:gary.jablonski@dem.ri.gov).

Sincerely,

A handwritten signature in black ink that reads "Gary Jablonski".

Gary Jablonski, Principal Engineer  
Office of Waste Management

cc: Matthew DeStefano, RIDEM  
Richard Gottlieb, RIDEM  
Ginny Lombardo, USEPA Region I  
Cornelia Mueller, NETC, Newport, RI  
✓ Stephen Parker, Tetra Tech

Draft FS comltr 101810

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**Office of Waste Management's Comments:**

**1. Page ES-3, Table, Contamination Volume Conceptual.**

Please explain why Industrial Worker scenario was not used for the contamination volume.

**2. Page 1-22, Section 1.10.2 Selection of Contaminants of Concern; whole section.**

As stated early in the text, any contaminants which exceed benchmarks or criteria were retained and incorporated into the PRG process. Please include TPH, Otto Fuel and the related components as soil, sediment and groundwater contaminants of concern at the Site. Also, please include lead as a soil contaminant of concern at the Site.

**3. Page 2-6, Section 2.2.1, Identification of Media of concern; Bullet 3, 2<sup>nd</sup> sentence.**

*"The scenarios causing unacceptable risk include the hypothetical residential use exposures, adolescent trespasser exposure, recreational use exposure...."*

As you are aware, RIDEM Remediation Regulations consider unrestricted recreational scenarios to meet Residential Standards. Please modify the above sentence to reflect this.

**4. Page 2-7, Section 2.2.2, Derivation of Preliminary Remediation Goals, Human Health PRGs; whole section.**

This section states that the cumulative target goal for PRGs is  $10^{-5}$ . A review of the information provided in Table 2-4 and 2-5 indicates that this goal will not be achieved if more than one contaminant is present at the target PRG concentration. To avoid this problem and in order to meet regulatory requirements, please set the PRGs to the  $10^{-6}$  criteria. In addition, please review and modify these tables as it appears that the more conservative value between the EPA and RIDEM criteria was not selected. Also, there appears to be some typos, such as the naphthalene value (soil lifelong residential value was listed as 3.9 however it was inverted to 9.3 then 93, RIDEM recreational soil value for chromium was listed as NA, trichloroethene groundwater value of  $10^{-6}$  was listed as 20 instead of 2, etc...) and certain compounds were not listed as PRGs, for example lead in soil, naphthalene, PCBs in the recreational scenarios, etc... (Please insure that any compound which exceeds RIDEM criteria was carried forth in the PRG process). Finally, it does not appear that leachability, either RIDEM or EPA, was incorporated into the PRG process for soils. Please modify the PRGs to include leachability.

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**5. Page 2-7, Section 2.2.2 Derivation of Preliminary Remediation Goals, Human Health PRGs; whole section.**

Please provide, in Table 2-6, the reference for the target cancer risk so that the proposed values can be evaluated.

**6. Page 2-7, Section 2.2.2 Derivation of Preliminary Remediation Goals, Ecological PRGs; whole section.**

Please submit the PRG document for review and approval. Based upon information presented in this FS, it appears that the PRGs were based upon toxicity tests. The PRG process should also have considered fish tissue results and the macro invertebrate analysis.

Please review the PRG for lead, as it appears that the proposed value is significantly higher than benchmarks, other States standards, and the lead PRG that has been used for other sites on this Navy Base. Based upon the toxicity test and the macro invertebrate analysis it is recommended that dose response curves for lead be based upon pond sample results and not stream sample results. Please provide the PRGs for metals and individual SVOCs which exceeded benchmarks and retain them as PRGs.

**7. Page 2-7, Section 2.2.2 Derivation of Preliminary Remediation Goals, Ecological PRGs; whole section.**

The report states that the ecological soil PRGs were not developed as the human health PRGs. The PRGs would be collocated with the soil ecological PRGs and as such remediation of the human health PRGs would concurrently remediate with the soil PRGs. This approach would have to be based upon the finding that the soil ecological PRGs are either equivalent to, or more conservative than, the human health PRGs. Please demonstrate that this is indeed the case and note in the report whether they are equivalent to residential or industrial/commercial human health PRGs.

**8. Page 2-8, Section 2.3 Development of Remedial Action Objectives, Bullet 2.**

This bullet notes that residential exposure to groundwater at the Site is theoretical due to current use. The Site is on the Navy's border and as such there is potential for off site use of groundwater by the golf course. Please eliminate the term "*theoretical*".

**9. Page 2-8, Section 2.3.1 Remedial Action Objectives, Bullet 1.**

*"Prevent the ingestion of and direct contact with soil and groundwater containing site specific COCs that exceed PRGs as pertinent to the appropriate land use."*

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Vapor intrusion was not an exposure pathway based upon the results of the initial RI investigation. Please confirm that the results from the additional investigation conducted earlier this year, both soil and groundwater, have not changed these findings.

**10. Page 2-8, Section 2.3.1 Remedial Action Objectives, Bullet 3.**

*“Prevent the migration of contaminants to the surface water and sediment via groundwater transport.”*

Please add the following language to the above sentence after “*groundwater*”: “*or soil erosion*”.

**11. Page 2-10, Section 2.4 Estimation of Areas and Volumes, Soil; 1<sup>st</sup> paragraph, 5<sup>th</sup> sentence.**

*“Figures 2-3 and 2-6 also provide the locations of the geophysical anomalies identified in the RI.”*

The Figures 2-3 and 2-6 in the FS Report reviewed by this Office does not show the geophysical anomalies. Please add the geophysical anomalies to these two figures.

**12. Page 2-10, Section 2.3.1 Estimated Areas and Volumes, Soil; whole section.**

Southwest of Building 185 free product was found along with elevated levels of TPH, Otto Fuel and other components. Please include this area as a soil area of concern.

**13. Page 2-10, Section 2.3.1 Estimated Areas and Volumes, Soil; whole section.**

As noted in previous comments mentioned above there are concerns with the PRGs process used in this FS which may ultimately affect the areas of concern. Also, the results from the Phase II RI may also generate similar concerns. Please submit the Navy’s response to comments and the results of the Phase II RI for review and discussion prior to the submittal of the Draft Final FS.

**14. Pages 3.20-3.26, Sections 3.45-3.46, Estimated Areas and Volumes, Soil/Groundwater/Sediment; whole sections.**

These sections include a statement that any remedial action that entails treatment in bedrock fractures has been found to be ineffective. This is not always the case. We request further evaluation of this option. Therefore, please retain bulk removal via groundwater extraction in this FS.

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**15. Page 3.32, Section 3.4.8 Disposal, Direct Surface Discharge; Conclusion.**

*“Direct surface discharge is retained for development into the remedial action alternatives”.*

This conclusion appears to be incorrect. This discharge is not carried over into Section 3.4.9 Summary of Representative Process Options. Please review and correct the conclusion as necessary.

**16. Page 3.43, Section 3.54, Removal, Mechanical Dredging; Conclusion.**

*“Although mechanical dredging is a viable removal option of contaminated sediment, it is not retained due to pond access restrictions.”*

Certain areas of the Site may have access concerns while in other areas this is not an issue. Also, mechanical dredging could be done in conjunction with other dredging methods. Please retain mechanical dredging in this FS.

**17. Page 4-2, Section 4.1.2 Alternative S0-2- Partial Excavation.**

In Figure 4-1 a red line was used to outline the areas to be excavated. It appears to include the yellow and green shaded areas. Please confirm this assumption. If this is not the case it is recommended that a different color line be employed. In the areas south of the paved area please include all of the surface debris piles.

In regards to the area to be covered, the landfill extends to the south of the paved area, please insure that all areas of surface/subsurface waste are either removed or capped. Please confirm that portions of the Site designated for wetland restoration would also be covered prior to restoration. Be advised that wetland restoration may also be found warranted in the areas of surface debris piles and waste south of the paved storage areas.

**18. Page 4-3 Section 4.1.2 Alternative S0-2- Partial Excavation; 3<sup>rd</sup> paragraph.**

This paragraph of the FS report deals with land use controls. Please include the following provisions to this paragraph: *“An annual report will be produced and submitted to the regulators documenting that the conditions of the LUC have been met; the Site will be subject to both inspection and regulatory action separately or together by both the EPA and the RIDEM”.* Please note that these provisions apply to all soil, sediments and groundwater alternatives which entail LUCs.

**19. Page 4-4 Section 4.1.3 Alternative SO-3, Hot Spot; whole section.**

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Please include the following areas: magnetic anomaly north of the paved area where drums were discovered; the area of free product south of Building 185; and all surface debris piles south of the paved area. Part of the hot spot removal is directed towards magnetic anomalies. In order to insure that all anomalies are addressed please include a figure, prior to the Final Draft FS, depicting their locations. Also, please provide proper justification as to why no source areas in the North Meadow are considered for hot spot removal.

**20. Page 4-4 Section 4.1.3 Alternative SO-3, Hot Spot; whole section.**

Please refer to Comment 17 mentioned above.

**21. Page 4-12 Section 4.2.3 Alternative SO3, Hot Spot; Cost.**

Please add the correct amount of sampling wells (15 wells instead of 10 listed and the cost of installing 10 wells not 5) to this cost estimate and revise as necessary.

**22. Page 5-2 Section 5.1.2 Alternative GW-2, In-Situ Enhanced Bioremediation; 3<sup>rd</sup> paragraph.**

This paragraph notes that as a conservative assumption a second injection would occur after 5 years. It is this Office's experience, depending upon the nature of the agent employed and the geological and hydrological conditions; a second injection is typically warranted within a time frame which ranges from months to a few years. Please change 5 years to anywhere from a few months to no greater than 2 years.

**23. Page 5-3 Section 5.1.2, Alternative GW-2, In-Situ Enhanced Bioremediation; 3<sup>rd</sup> paragraph.**

This paragraph states that after the first year groundwater monitoring is assumed to occur annually. In accordance with RIDEM regulations biannual groundwater monitoring is required for a period of at least 30 years, unless future data warrants a request to the Department for a lesser frequency. Such requests will be considered on a case by case basis and a request is not an approval or agreement. Please modify this and GW-1 and GW-2 to include this provision. This alternative also establishes LUC to insure that groundwater is not used for human consumption. Due to the fact that the Site is on the border of the Navy's property, such LUCs would also have to be designed to insure that an offsite well is not affected by onsite contaminated groundwater. Please note this provision in this and all alternatives involving an LUC.

**24. Page 6-2 Section 6.1.2, Alternative SD-2, Removal Stream Sediment; 1<sup>st</sup> paragraph.**

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This paragraph states that NUWC Pond is considered the termination point for any contaminants from the Site. It is now known that the sediments in NUWC Pond are contaminated and that contaminated groundwater discharges to the site. There have been reports of turbid water discharging from NUWC Pond. As such, it is not possible to state that NUWC pond is the termination point for contaminants from the site as the areas downstream of the pond have not been sampled. It would seem prudent to conduct, in the future, sampling of this nature during the predesign investigation. Please revise the paragraph as noted including the need for sampling downstream of the pond.

**25. Page 6-2 Section 6.1.2, Alternative SD-2, Removal Stream Sediment; 4<sup>th</sup> paragraph.**

The proposal calls for the placement of a sediment cap. Typically sediment caps are limited to a portion of an ecosystem (i.e. a section of river or a pond). The current proposal is to cap the entire pond. This approach has a number of concerns, to this Office, with respect to its implementation. Please provide proper justification for this or alternate scenarios.

**26. Table 2-3 Potential Action Specific ARARs and TBCs.**

Please change the heading of this table to the correct Site NUSC not OFFTA.

**27. Table 2-3 Potential Action Specific ARARs and TBCs, page 3; Citation DEM OWM-SW04-01, 1.7.14(b).**

*"The site will be closed under a plan developed in accordance with CERCLA. As such, the closure requirements of the site will be documented in the ROD, the remedial design (RD), and the Operations and Maintenance Plan (O&M) (including a monitoring plan). Compliance with the closure requirements contained in the ROD, RD, and O&M plan will be deemed compliance with this ARAR."*

Please delete this entire Action to Be Taken to Attain ARAR column stated above and replace with the following text: *"An approved closure plan will be submitted and implemented for the Site."*

**28. Table 2-3 Potential Action Specific ARARs and TBCs, page 4; Citation DEM OWM-SW04-01, 1.8.01(a) and 1.8.01(b).**

*"This ARAR is cited to memorialize the requirements to monitor groundwater and to meet closure requirements. Because contaminants will be left in place the site will be closed as a waste management unit, and undergo long term monitoring. The remedial design (RD), remedial action work plan (RAWP), operations and monitoring plan (O&M) (including the long term monitoring plan [LTMP]) developed for this cleanup will contain the specific monitoring and closure requirements for the waste management unit. These requirements*

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may differ from those cited in this regulation for landfill purposes. Compliance with the groundwater monitoring and closure requirements contained in the LTMP, RD, RAWP, and O&M plan for this site will be deemed compliance with this ARAR."

The above text is not wording that the State has seen in any other CERCLA Site in regards to the State's ARARs. Please delete the 3<sup>rd</sup>, 4<sup>th</sup>, and 5<sup>th</sup> sentences in this Action to Be Taken to Attain ARAR column, as underlined above.

**29. Table 2-3 Potential Action Specific ARARs and TBCs, page 4; Citation DEM OWM-SW04-01, 2.1.04.**

"An erosion and sediment control plan will be developed for this site. It is intended that the RD and the RAWP, to be developed for this cleanup, will contain the specific erosion and sediment controls requirements for the remedial construction. Compliance with the RD and RAWP requirements for erosion and sediment control will be deemed compliance with this ARAR."

The above text is not wording that the State has seen in any other CERCLA Site in regards to the State's ARARs. Please delete the 2<sup>nd</sup> and 3<sup>rd</sup> sentences in this Action to Be Taken to Attain ARAR column, as underlined above.

**30. Table 2-3 Potential Action Specific ARARs and TBCs, page 5; Citation DEM OWM-SW04-01, 2.1.08 (a) (8).**

"It is intended that this subsection serve as the ARAR memorializing the requirements for construction of new monitoring wells. The specific construction requirements will be described in the Long Term Monitoring Plan (LTMP). Such requirements may differ from those cited in this regulation, and will be developed to be appropriate for this site, and not for a solid waste landfill. Compliance with the monitoring well construction requirements of the LTMP will be deemed compliance with this ARAR."

Please delete the 2<sup>nd</sup>, 3<sup>rd</sup>, and 4<sup>th</sup> sentences, the following text in the 1<sup>st</sup> sentence: "subsection serve as the", and change "memorializing" to "memorialize" in this Action to Be Taken to Attain ARAR column, as underlined above.

**31. Table 2-3 Potential Action Specific ARARs and TBCs, page 5; Citation DEM OWM-SW04-01, 2.1.08 (c).**

"It is intended that this subsection serve as the ARAR memorializing the requirement to have and maintain monitoring wells for the purpose of monitoring groundwater conditions at the site. Because this remedy leaves waste in place, it will be supported with a Long Term Monitoring Plan (LTMP) for groundwater. The LTMP will be directed by a work plan that

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will contain the specific monitoring requirements. Such requirements may differ from those cited in this regulation, and will be developed to be appropriate for this site, and not for a solid waste landfill. Compliance with the monitoring well requirements of the LTMP will be deemed compliance with this ARAR.

Please delete the 2<sup>nd</sup>, 3<sup>rd</sup>, 4<sup>th</sup> and 5<sup>th</sup> sentences, the following text in the 1<sup>st</sup> sentence: “*subsection serve as the*”, and change “*memorializing*” to “*memorialize*” in this Action to Be Taken to Attain ARAR column, as underlined above.

**32. Table 2-3 Potential Action Specific ARARs and TBCs, page 5; Citation DEM OWM-SW04-01, 2.2.12 (d) (1) and 2.2.12(d) (2) (ii) (iii) and (v).**

*“Remedies including cover systems may include appropriate vegetation requirements of a soil cover”*

Please replace the word “*may*” with “*shall*” in the above sentence in this Action to Be Taken to Attain ARAR column.

**33. Table 2-3 Potential Action Specific ARARs and TBCs, page 6; Citation DEM OWM-SW04-01, 2.3.04(e), (f).**

*“The ROD will include provisions to maintain the cover, and to assure that cover provides adequate levels of reduced permeability for specific areas cited by RIDEM. It is intended that this subsection serve as the ARAR memorializing the requirement to have and maintain a cover, not to identify permeability requirements. Asphalt has been determined to provide an adequate barrier for specific areas cited by RIDEM, and a two foot soil cover has been determined provide an adequate barrier for the remainder of the land within the waste management area.”*

Please delete this entire Action to Be Taken to Attain ARAR column stated above and replace with the following text: “*If remedial actions involve a cover system, than the requirements of this rule would be followed*”.

**34. Table 2-3 Potential Action Specific ARARs and TBCs, page 6; Citation DEM OWM-SW04-01, 2.3.05.**

*It is intended that this subsection serve as the ARAR memorializing the requirement that no contamination of groundwater be permitted beyond the boundary of the WMA.*

Please delete the following text: “*subsection serve as the*” and change “*memorializing*” to “*memorialize*” in the above sentence in this Action to Be Taken to Attain ARAR column.

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**35. Table 2-3 Potential Action Specific ARARs and TBCs, page 7; Citation DEM OWM-SW04-01, 2.3.10.**

*"It is intended that this subsection serve as the ARAR memorializing the requirement that appropriate surface drainage considerations must be developed for the WMA cover. The cover system would be designed to prevent erosion, sedimentation, and standing water on the cover. Minimum slope requirements for solid waste landfills would not be relevant or appropriate for a soil cover which is not intended to reduce infiltration."*

Please delete the last sentence, the following text in the 1<sup>st</sup> sentence: "subsection serve as the", and change "memorializing" to "memorialize" in this Action to Be Taken to Attain ARAR column, as underlined above.

**36. Table 2-3 Potential Action Specific ARARs and TBCs, page 7; Citation DEM OWM-SW04-01, 2.3.11.**

*"It is intended that this subsection serve as the ARAR memorializing the requirement to have and maintain monitoring wells for the purpose of monitoring groundwater conditions. Because this remedy leaves waste in place, it will be supported with a Long Term Monitoring Plan (LTMP) for groundwater. The LTMP will be directed by a work plan that will contain the specific monitoring well requirements. Such requirements may differ from those cited in this regulation, and will be developed to be appropriate for this site, and not for a solid waste landfill. Compliance with the monitoring well requirements of the LTMP work plan will be deemed compliance with this ARAR."*

Please delete the 2<sup>nd</sup>, 3<sup>rd</sup>, 4<sup>th</sup> and 5<sup>th</sup> sentences and the following text in the 1<sup>st</sup> sentence: "subsection serve as the", and change "memorializing" to "memorialize" in this Action to Be Taken to Attain ARAR column, as underlined above.

**37. Table 2-3 Potential Action Specific ARARs and TBCs, page 8; Citation DEM OWM-SW04-01, 2.3.14.**

*"This alternative will involve alteration of land within wetlands and flood zones. This regulation is being cited to memorialize the requirement to protect the adjacent wetland resources during construction and maintenance of a soil cover over soil containing residual contamination and solid waste debris. The RD, RAWP, and the LTMP will be developed and provide specific requirements, which may differ from those in the cited regulation. Compliance with the RD, RAWP and the LTMP will be deemed compliance with this regulation."*

Please delete the 3<sup>rd</sup> and 4<sup>th</sup> sentences in this Action to Be Taken to Attain ARAR column, as underlined above.

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**38. Table 4-8 Action-Specific ARARs and TBCs Soil Alternative SO<sub>2</sub>, page 3; Citation SW04-01, 1.7.14(b).**

Please refer to Comment 27 mentioned above.

**39. Table 4-8 Action-Specific ARARs and TBCs Soil Alternative SO<sub>2</sub>, page 4; Citation DEM OWM-SW04-01, 1.8.01(a) and 1.8.01(b).**

Please refer to Comment 28 mentioned above.

**40. Table 4-8 Action-Specific ARARs and TBCs Soil Alternative SO<sub>2</sub>, page 4; Citation DEM OWM-SW04-01, 2.1.04.**

Please refer to Comment 29 mentioned above.

**41. Table 4-8 Action-Specific ARARs and TBCs Soil Alternative SO<sub>2</sub>, page 5; Citation DEM OWM-SW04-01, 2.1.08 (a) (8).**

Please refer to Comment 30 mentioned above.

**42. Table 4-8 Action-Specific ARARs and TBCs Soil Alternative SO<sub>2</sub>, page 5; Citation DEM OWM-SW04-01, 2.1.08 (c).**

Please refer to Comment 31 mentioned above.

**43. Table 4-8 Action-Specific ARARs and TBCs Soil Alternative SO<sub>2</sub>, page 5; Citation DEM OWM-SW04-01, 2.2.12 (d) (1) and 2.2.12(d) (2) (ii) (iii) and (v).**

Please refer to Comment 32 mentioned above.

**44. Table 4-8 Action-Specific ARARs and TBCs Soil Alternative SO<sub>2</sub>, page 6; Citation DEM OWM-SW04-01, 2.3.04(e), (f).**

Please refer to Comment 33 mentioned above.

**45. Table 4-8 Action-Specific ARARs and TBCs Soil Alternative SO<sub>2</sub>, page 6; Citation DEM OWM-SW04-01, 2.3.05.**

Please refer to Comment 34 mentioned above.

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- 46. Table 4-8 Action-Specific ARARs and TBCs Soil Alternative SO<sub>2</sub>, page 6; Citation DEM OWM-SW04-01, 2.3.10.**

Please refer to Comment 35 mentioned above.

- 47. Table 4-8 Action-Specific ARARs and TBCs Soil Alternative SO<sub>2</sub>, page 7; Citation DEM OWM-SW04-01, 2.3.11.**

Please refer to Comment 36 mentioned above.

- 48. Table 4-8 Action-Specific ARARs and TBCs Soil Alternative SO<sub>2</sub>, page 7; Citation DEM OWM-SW04-01, 2.3.14.**

Please refer to Comment 37 mentioned above.

- 49. Table 4-11 Action-Specific ARARs and TBCs Soil Alternative SO<sub>3</sub>, page 3; Citation SW04-01, 1.7.14(b).**

Please refer to Comment 27 mentioned above.

- 50. Table 4-11 Action-Specific ARARs and TBCs Soil Alternative SO<sub>3</sub>, page 4; Citation DEM OWM-SW04-01, 1.8.01(a) and 1.8.01(b).**

Please refer to Comment 28 mentioned above.

- 51. Table 4-11 Action-Specific ARARs and TBCs Soil Alternative SO<sub>3</sub>, page 4; Citation DEM OWM-SW04-01, 2.1.04.**

Please refer to Comment 29 mentioned above.

- 52. Table 4-11 Action-Specific ARARs and TBCs Soil Alternative SO<sub>3</sub>, page 5; Citation DEM OWM-SW04-01, 2.1.08 (a) (8).**

Please refer to Comment 30 mentioned above.

- 53. Table 4-11 Action-Specific ARARs and TBCs Soil Alternative SO<sub>3</sub>, page 5; Citation DEM OWM-SW04-01, 2.1.08 (c).**

Please refer to Comment 31 mentioned above.

- 54. Table 4-11 Action-Specific ARARs and TBCs Soil Alternative SO<sub>3</sub>, page 5; Citation DEM OWM-SW04-01, 2.2.12 (d) (1) and 2.2.12(d) (2) (ii) (iii) and (v).**

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Please refer to Comment 32 mentioned above.

- 55. Table 4-11 Action-Specific ARARs and TBCs Soil Alternative SO3, page 6; Citation DEM OWM-SW04-01, 2.3.04(e), (f).**

Please refer to Comment 33 mentioned above.

- 56. Table 4-11 Action-Specific ARARs and TBCs Soil Alternative SO3, page 6; Citation DEM OWM-SW04-01, 2.3.05.**

Please refer to Comment 34 mentioned above.

- 57. Table 4-11 Action-Specific ARARs and TBCs Soil Alternative SO3, page 6; Citation DEM OWM-SW04-01, 2.3.10.**

Please refer to Comment 35 mentioned above.

- 58. Table 4-11 Action-Specific ARARs and TBCs Soil Alternative SO3, page 7; Citation DEM OWM-SW04-01, 2.3.11.**

Please refer to Comment 36 mentioned above.

- 59. Table 4-11 Action-Specific ARARs and TBCs Soil Alternative SO3, page 7; Citation DEM OWM-SW04-01, 2.3.14.**

Please refer to Comment 37 mentioned above.

- 60. Table 6-8 Action-Specific ARARs and TBCs Sediment Alternative SD2, page 1; Citation SW04-01, 1.7.14(b).**

Please refer to Comment 27 mentioned above

- 61. Table 6-8 Action-Specific ARARs and TBCs Sediment Alternative SD2; page 2; Citation DEM OWM-SW04-01, 1.8.01(a) and 1.8.01(b).**

Please refer to Comment 28 mentioned above.

- 62. Table 6-8 Action-Specific ARARs and TBCs Sediment Alternative SD2, page 2; Citation DEM OWM-SW04-01, 2.1.04.**

Please refer to Comment 29 mentioned above.

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- 63. Table 6-8 Action-Specific ARARs and TBCs Sediment Alternative SD2, page 3; Citation DEM OWM-SW04-01, 2.3.04(e), (f).**

Please refer to Comment 33 mentioned above.

- 64. Table 6-8 Action-Specific ARARs and TBCs Sediment Alternative SD2, page 3; Citation DEM OWM-SW04-01, 2.3.05.**

Please refer to Comment 34 mentioned above.

- 65. Table 6-8 Action-Specific ARARs and TBCs Sediment Alternative SD2 page 3; Citation DEM OWM-SW04-01, 2.3.14.**

Please refer to Comment 37 mentioned above.

- 66. Table 6-11 Action-Specific ARARs and TBCs Sediment Alternative SD3, page 1; Citation SW04-01, 1.7.14(b).**

Please refer to Comment 27 mentioned above

- 67. Table 6-11 Action-Specific ARARs and TBCs Sediment Alternative SD3; page 2; Citation DEM OWM-SW04-01, 1.8.01(a) and 1.8.01(b).**

Please refer to Comment 28 mentioned above.

- 68. Table 6-11 Action-Specific ARARs and TBCs Sediment Alternative SD3, page 2; Citation DEM OWM-SW04-01, 2.1.04.**

Please refer to Comment 29 mentioned above.

- 69. Table 6-11 Action-Specific ARARs and TBCs Sediment Alternative SD3, page 3; Citation DEM OWM-SW04-01, 2.3.04(e), (f).**

Please refer to Comment 33 mentioned above.

- 70. Table 6-11 Action-Specific ARARs and TBCs Sediment Alternative SD3, page 3; Citation DEM OWM-SW04-01, 2.3.05.**

Please refer to Comment 34 mentioned above.

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- 71. Table 6-11 Action-Specific ARARs and TBCs Sediment Alternative SD3, page 3;  
Citation DEM OWM-SW04-01, 2.3.14.**

Please refer to Comment 37 mentioned above.

- 72. Table 6-14 Action-Specific ARARs and TBCs Sediment Alternative SD4, page 3;  
Citation DEM OWM-SW04-01, 2.1.04.**

Please refer to Comment 29 mentioned above.