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LETTER AND COMMENTS FROM RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL
MANAGEMENT REGARDING DRAFT FINAL PHASE II REMEDIAL INVESTIGATION
BASELINE ECOLOGICAL RISK ASSESSMENT SITE 17 BUILDING 32 NS NEWPORT RI
9/20/2011
RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT



RHODE ISLAND

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

20 September 2011

Maritza Montegross
NAVFAC MIDLANT (Code OPNEEV)
Environmental Restoration
Building Z 144, Room 109
9742 Maryland Avenue
Norfolk, VA 23511-3095

Re: Draft Final Phase II Remedial Investigation
Baseline Ecological Risk Assessment
Site 17, Building 32, Gould Island, NETC

Dear Ms. Montegross,

The Office of Waste Management at the Rhode Island Department of Environmental Management has conducted a review of the *Draft Final Phase II Remedial Investigation, Baseline Ecological Risk Assessment*, Site 17, dated August 2011 for Building 32, Gould Island (Site 17), Naval Station Newport, located in Newport, RI. This Office will concur with the *Draft Final Phase II Remedial Investigation, Baseline Ecological Risk Assessment* if the following changes are made:

- Please replace the “Draft” pages of the Executive Summary with updated “Draft Final” pages which address RIDEM’s comment #'s 1-6;
- Please retain lead as a COC for sediment in the FS (comment #35);
- Please include residential groundwater consumption on page 7-17, Section 7.5 “Recommendations” under potential human health risks. As this document discusses residential groundwater consumption, it is appropriate to make this revision (comment #60);
- Please include TPH in soil/sediment as a COC on page 7-17, Section 7.5 “Recommendations” under potential human health risks. Please note that now that a CERCLA risk was found at the Site, the State Regulations are ARARS (comment #'s 56 & 60);
- Please retain individual PAHs as COCs for sediment to be evaluated in the FS (comments 60 & 61); and,
- Please include ERL-Qs as well as ERM-Qs in the third bullet on page 7-17, Section 7.5 “Recommendations” for the potential for ecological risk.

Please be advised that a number of source areas that were not investigated or adequately investigated (i.e. sludge pits for the acetylene generator building; tanks for the power plant, etc.). These areas need to be properly investigated prior to a final remedial action for this Site.

If you have any questions, in regards to this letter, please contact me at (401) 222-2797, extension 7020 or by e-mail at pamela.crump@dem.ri.gov.

Sincerely,



Pamela E. Crump, Sanitary Engineer
Office of Waste Management

cc: Matthew DeStefano, DEM OWM
Richard Gottlieb, DEM OWM
Gary Jablonski, DEM OWM
Deb Moore, NSN
Kymberlee Keckler, EPA Region I
Steve Parker, Tetra Tech