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U S NAVY RESPONSES TO REGULATORY COMMENTS ON DRAFT FINAL  
SUPPLEMENTAL REMEDIAL INVESTIGATION AT SITE 8 NETC NEWPORT RI  
10/14/2011  
NAVFAC NORTHEAST

**Navy Responses to RIDEM's Comments (dated August 3, 2011) on the  
Draft Final Supplemental Remedial Investigation for Site 8 – NUSC Disposal Area  
NAVSTA Newport, Rhode Island  
October 14, 2011**

On May 31, 2011, the Navy issued the draft final Supplemental Remedial Investigation (SRI) for Site 8, the Naval Undersea Systems Center (NUSC) Disposal Area, at the Naval Station (NAVSTA) Newport, Rhode Island. The Rhode Island Department of Environmental Management (RIDEM) provided comments on June 16, 2011 and the Navy provided responses on July 13, 2011. RIDEM provided additional comments on August 3, 2011 and the Navy's responses are provided below. Comment numbers refer to the numbering used in the June 16, 2011 letter.

**Comment 3:** Based on similarities in concentrations of arsenic found in type Se soil for both surface and subsurface soils at the Site (as shown below), please include arsenic as a COC for subsurface soil as well as surface soil for type Se soil. Since the Feasibility Study has already been issued, please provide any revised pages necessary to this document.

Four highest arsenic concentrations in surface soil:

Concentration (mg/kg)	Sample location	Area	Soil Type	Depth (ft)	Exposed/Unexposed	RI/SRI	Date
90	TP-13	north meadow	PmB	0-1	exposed	RI	8/15/03
45.8	SB-118	paved gated storage area	Se	0-2	exposed	RI	3/4/08
41 J	SB-04	paved gated storage area	Se	1-2	paved	RI	8/18/03
32.7	SB-150	paved gated storage area	Se	0-2	paved	RI	3/5/08

Four highest arsenic concentrations in subsurface soil:

Concentration (mg/kg)	Sample location	Area	Soil Type	Depth (ft)	Exposed/Unexposed	RI/SRI	Date
122	SB-113	paved open storage area	Se	4-6	paved	RI	3/3/08
40	TP-13	north meadow	PmB	2-3	exposed	RI	8/15/03
35	SB-03	paved gated storage area	Se	3-4	exposed	RI	8/19/03
33	SB-05	paved open storage area	Se	2-3	paved	RI	8/19/03

In regards to the soil type, please refer to the attached<sup>1</sup> Figure 1-6 from the NUSC RI of the fill areas determined from aerial photos. RIDEM does not agree with classification of the soil as type Se for the majority of the Site since much of this area contains fill material. Please be advised that RIDEM, to date, has not accepted the "Basewide Background Study Report". Levels of arsenic in the 30-40 mg/kg range area not acceptable background levels.

**Response:** As agreed at the September 21, 2011 Remedial Project Managers (RPM) meeting, this comment is deferred to the Feasibility Study (FS) and the Navy is finalizing the SRI per the July 13, 2011 response letter.

The remedial alternatives developed in the FS will address the identified risks associated with exposure to arsenic in soil through excavation and/or capping. Alternative SO2 includes excavation of the top 2 feet of soil and replacement with clean fill material. Of the sample locations cited in the above comment, the two highest surface soil concentrations (TP-13 and SB-118) would be excavated and exposure to the remaining locations in surface and subsurface soil would be prevented by the 2 feet of clean backfill, the existing site pavement, and land use controls. Similarly, the 2-foot soil cap under Alternative SO3 would prevent contact with arsenic in surface and subsurface soil.

<sup>1</sup> Figure not included in this response document.

Comment 4: As stated in the previous comment, RIDEM does not accept the levels of arsenic documented in the background study. PRGs should also be developed for individual PAHs based on  $1 \times 10^{-6}$  risk level for each contaminant. Please be advised that any contaminant that exceeded a risk level of  $1 \times 10^{-6}$  in the RI or the SRI must be carried forth into the FS.

**Response:** As agreed at the September 21, 2011 RPM meeting, this comment is deferred to the FS and the Navy is finalizing the SRI per the July 13, 2011 response letter.

Table 6-6 of the SRI lists the identified contaminants of concern (COCs) driving unacceptable risks at the site. See the response to Comment #3 above regarding arsenic. The FS will be revised to develop preliminary remediation goals (PRGs) for the individual polycyclic aromatic hydrocarbons (PAHs) that are COCs [i.e., benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene, dibenzo(a,h)anthracene, and indeno(1,2,3-cd)pyrene]. Soil PRGs will be based on the lower of a  $10^{-6}$  risk level and RIDEM's Method 1 criteria or background levels.