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EMAIL REGARDING U S FISH AND WILDLIFE COMMENTS ON U S NAVY RESPONSES
REGARDING FEASIBILITY STUDY NETC NEWPORT RI
12/14/2011
U S FISH AND WILDLIFE

Ropp, Jim

From: Kenneth_Munney@fws.gov
Sent: Wednesday, December 14, 2011 12:50 PM
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Cc: Lombardo.Ginny@epamail.epa.gov; Maritza Montegross (maritza.montegross@navy.mil); Pamela Crump; hoskins.bart@epamail.epa.gov
Subject: Re: Newport NUSC Site 8 FS - Responses to EPA Comments
Attachments: 2011-12-08_Newport NUSC FS EPA RTC.PDF
Categories: Newport

Jim -

Some brief thoughts on the Navy's December 8th Response to Comments to EPA comments, and in light of today's discussions.

Comment 31: Restoration of nearshore habitat should be conducted after capping or removal are conducted. Nearshore restoration of emergent habitat or shoreline habitat impacted through remedial actions needs to be restored post-remedy. Allowing natural regeneration, over a 5 year time-scale, as suggested, to restore habitat features is not acceptable and is not standard practice on Region 1 CERCLA sites. Benthic macroinvertebrate habitat will have to naturally recolonize over time, which will result in reduced functionality over an extended time period, but is typically not actively addressed through CERCLA actions.

Comment 32: It appears that 6 inches of applied material, as a sediment cover, were agreed to be sufficiently protective of benthic invertebrates, on the October 5, 2011 conf call. However, six inches of material over contaminated sediments is marginally protective if nothing happens to the cap material. Potential impacts to the material only cap include bioturbation (invertebrates or vertebrates), storm events, human disturbance, groundwater upwelling, etc. These factors and unquantified variables suggest that a thicker cap should be applied, if full removal is not done. As stated during today's conference call, scouring may be happening resulting in sediment transfer to Narragansett Bay, which suggests erosional forces may be at play and could compromise cap effectiveness. We agree that natural sedimentation may be augmenting surface contaminant attenuation but usually sedimentation is at a very slow rate and nominally contributory.

Comment 33: We agree that the use of geotextile is not the most favored or natural approach to remediation/restoration of benthic habitat. It will provide the purposes as stated by the Navy but may also have limited lifespan and seriously handicap natural processes in the pond, as stated by EPA.

We agree with discussions concerning EPA's position on LUCs and LTOM for the dam. As stated, any remedy that leaves elevated contamination behind the dam, has to provide for long-term operation and maintenance of the dam. This has been required at other Region 1 CERCLA sites and is currently in effect at Woods Pond dam on the Housatonic, as part of the GE/PCB Housatonic site.

General Comment 3: In general, restoration of habitat needs to be incorporated for all impact areas, as stated. We are interested to participate in restoration options for all areas.

We look forward to further discussions on FS issues, including RTCs to RIDEM concerns, and the Draft Final FS.

Happy and Healthy Holidays to All

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12/08/2011 06:00 PM

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Subject Newport NUSC Site 8 FS - Responses to EPA
Comments

All:

Here are the responses to EPA's comments on the revised draft FS (attached).

The responses have been updated based on the recent technical/RPM meetings as well as subsequent Navy discussions.

As requested, updated ARAR tables are also provided (Attachment 2).

Attachment 1 (Emulsified Oil Design Tool Spreadsheets) is provided for completeness, but has not changed from the version previously provided.

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