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EMAIL REGARDING U S EPA REGION I REVIEW AND COMMENTS ON THE DRAFT
PROPOSED PLAN FOR SITE 8 NETC NEWPORT RI
5/16/2012
U S EPA REGION I

Ropp, Jim

From: Ginny Lombardo <Lombardo.Ginny@epamail.epa.gov>
Sent: Wednesday, May 16, 2012 5:09 PM
To: Ropp, Jim; Maritza Montegross (maritza.montegross@navy.mil)
Cc: Barclift, David J CIV NAVFAC LANT, EV (david.barclift@navy.mil); Deb Moore (deborah.j.moore@navy.mil); Ken Munney; Pamela Crump; Paul Steinberg (steinberg@mabbett.com); Parker, Stephen; winoma.johnson@navy.mil; David Peterson; Chau Vu; Bart Hoskins; Sarah White
Subject: Re: NAVSTA Newport Site 8 (NUSC) Proposed Plan (draft)
Attachments: Comments on the Draft NUSC Proposed Plan - Dave P.docx

Categories: Newport

Maritza and Jim-

As reviewed at today's RPM meeting, here are EPA's comments on the Draft PP for NUSC:

- Page 2, "What caused the contamination at Site 8?" section: Add additional information in this section on the releases and potential sources of contamination at the site. For example, discuss the historical use of Building 185 for hazardous material storage and the release of Otto Fuel that occurred in this area; discuss the past removal actions that occurred to remove contaminated soils and debris (detailed on page 4); discuss TCE contamination from unknown source.
- Page 5 - Define SVOC
- Page 5, Step 4 - Characterize the Risk - last bullet - For ingestion of fish, clarify in the PP why this exposure route was not carried forward for a cleanup objective. See related comment from Dave P.
- Page 7, Cleanup Objectives - Incorporate a table of PRGs for major contaminants. See page 3-15 of EPA Guidance: "Present and describe the basis for preliminary cleanup levels for major contaminants of concern." This can be limited to the major risk driver COCs for the different media.
- Page 8, GW2 write-up - Remove the discussion on LUCs as this is presented for all alternatives in the "Common Elements" section. Either remove the discussion on remedial timeframe or add comparable language for the other GW alternatives. Delete the reference on "active" remediation, as GW2 does not include active treatment.
- Page 9, Common Elements, 1st bullet - Ensure that the planned "selective" excavation areas are all adequately represented in this discussion
- Page 10, Preferred Action Alternative - Add language that describes the most decisive considerations from the nine criteria analysis that affected the selection of the Preferred Alternative (see page 3-16 of EPA Guidance). After re-reading, I do see that the section does have some of this information. However, since the PP is the first document to explain why the Navy is recommending the preferred alternative over the others, it is important to support the preferred alternative with an explanation of the major factors that form the basis of the selection. Possibly, just re-arrange the information so that the reasons are specified clearly in the discussion of each selected alternative. Based on RIDEM's comment today, the PP should state why GW3 is preferred over GW4 (more than just the use of the chemical oxidants).
- Page 10, 2nd column, 1st Para - The text indicates that bioremediation "may also help to promote the desired groundwater conditions (geochemistry) to support subsequent MNA." What is meant by this statement? It should be acknowledged that bioremediation may increase metals in groundwater.
- Figures - Add another Figure that is a closer aerial to show the site layout with locations of buildings, roads and adjacent properties.

Also attached are comments on the Draft PP from Dave P.

Please let me know if the Navy wants to discuss any of these further for clarification. Also, please provide the draft public notice/newspaper announcement for review once that is prepared.

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Date: 04/30/2012 03:40 PM
Subject: NAVSTA Newport Site 8 (NUSC) Proposed Plan (draft)

Ginny, Pam -

Attached, please find the draft Site 8 Proposed Plan for your review. Hardcopies are being sent via overnight FedEx as indicated in the attached transmittal letter.

We would like to discuss any major comments during the May 16 RPM meeting. Remaining comments are requested by May 25.

Note that some of the figures were taken directly from the draft final FS which is being prepared concurrently with this Proposed Plan. Those figures don't fit as well into the Proposed Plan format, so we will further clarify/simplify them for the next version of the Proposed Plan.

Thanks,

Jim Ropp, P.E. | Project Manager

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[attachment "Transmittal Letter.PDF" deleted by Ginny Lombardo/R1/USEPA/US] [attachment "NAVSTA Newport Site 8 NUSC PRAP (draft).pdf" deleted by Ginny Lombardo/R1/USEPA/US]

Comments on the NUSC Proposed Plan

- Page 1, What You Think box Add to the “What You Think” box (as was done for the New London Lower Subbase Proposed Plan): “Section 404 of the Clean Water Act and Executive Orders 11990 (Protection of Wetlands) and 11988 (Protection of Floodplains), as incorporated under Federal Emergency Management Agency regulations that are relevant and appropriate to the cleanup, require a determination that there is no practical alternative to taking federal actions affecting federal jurisdictional wetlands, aquatic habitats and floodplain. EPA and the Navy are requesting public comment concerning its finding that the proposed cleanup alternative for sediments is the least environmentally damaging practicable approaches for protecting wetlands and aquatic habitats. EPA and the Navy are also proposing a finding under the Toxic Substances Control Act that the risk-based PCB cleanup level for sediments and the covering of soils containing low levels of PCBs will not pose an unreasonable risk of injury to health or the environment.”
- Page 2, 1st col. In the second sentence of the fourth paragraph insert “, which forms the Administrative Record for this Proposed Plan,” after “other documents.”
- Page 3, History Box For the 1989 note that the official name given to the Site at the time of listing is the “Naval Education Training Center Superfund Site.”
- Page 5, 1st col. In the fifth sentence of the fourth paragraph insert “in compliance with State requirements” after “will address the petroleum.”
- Page 7, Cleanup Obj. On page 6, the last bullet identified an unacceptable risk from ingestion of fish but the cleanup objectives don’t include preventing human ingestion of contaminated fish from the Site.
- Page 8, GW-2 Remove the following sentence from the second paragraph since there is no active remediation of VOCs under this alternative: “MNA of metals, an EPA-approved remedial option, would be a follow-on remedial approach to the active remediation of the chlorinated VOC plume.”
- Page 8, all of the GW alt. descriptions Figure 2-7 shows areas of groundwater contamination right up to the fence line. If it will be necessary to establish LUCs on the private property adjacent to the Site that component of the alternatives needs to be clearly identified in the alternative descriptions and elsewhere in this document.
- Page 9, 2nd col. In the second bullet add a new third sentence: “Groundwater cleanup standards applicable to the rest of the Site will not have to be achieved within the waste management area, provided LUCs are established to prevent groundwater use within the area.”

- Page 9, 2nd col. Regarding the last sentence of the third bullet, Navy needs to determine if there is an issue with establishing state compliant land use restrictions in RI.
- Page 9, 2nd col. Common Elements should also discuss the need to establish long-term monitoring requirements for soils and groundwater.
- Page 10, Pref. Alt. In the second paragraph, need to describe the need to maintain the paved coverage over areas where a cover will not be installed.
- Page 10, Pref. Alt. In the third paragraph change the second sentence to: “The human health and ecological risk evaluations concluded that leaving PCBs in-place, under a cover with land use controls and long-term monitoring (disposal)...”
- Also change the last sentence to: “Accordingly and based on the provisions of 40 CFR § 761.61(c), EPA is proposing to make a determination to be included in the Record of Decision that the in-place management of PCBs in soil will not pose an unreasonable risk to public health or the environment.”
- Page 10, Pref. Alt. In the fourth paragraph concerning groundwater the text needs to note that groundwater cleanup standards to not have to be met beneath the waste management area, provide LUCs are established to prevent groundwater use within the area. Also, not previous question as to whether LUCs for groundwater will need to extend across the fence line into private property (the golf course). If so this needs to be discussed in more detail in the text.
- Page 10, Pref. Alt. In the sixth paragraph insert “Environmentally” after “Least.” As noted for page one the Navy needs to specifically solicit public comment on its determination the preferred alternative is the “Least Environmentally Damaging Practicable Alternative.”
- Page 10, Pref. Alt. Replace the concluding paragraph with the following modified text from EPA’s Proposed Plan Guidance: “Based on information currently available, the Navy believes the Preferred Alternative meets the threshold criteria and provides the best balance of tradeoffs among the other alternatives with respect to the balancing and modifying criteria. The Navy expects the Preferred Alternative to satisfy the following statutory requirements of CERCLA §121(b): 1) be protective of human health and the environment; 2) comply with ARARs; 3) be cost-effective; 4) utilize permanent solutions and alternative treatment technologies or resource recovery technologies to the maximum extent practicable; and 5) partially satisfy the preference for treatment as a principal element to the extent practicable.”
- Page 11, For More Info. In the second sentence insert “, which forms the Administrative Record for this Proposed Plan,” after “other site documents.”

Tables 1 - 3	The Tables need to identify whether each alternative meets the criterion, partially meets the criterion, or does not meet the criterion. Do not base the symbols on “good,” “average,” or “poor.” In rating the alternatives need to be consistent with the analysis presented in the FS.
Table 2	MNA alone (GW-2) does not meet the treatment criterion. GW-3 and GW-4 only partially meet the criterion since not all groundwater will be treated.
Figures	Need to include a figure that shows where land use controls will need to be established for the preferred alternative for both soil and groundwater. Note previous comments regarding whether the LUCs will need to extend off- base since the groundwater contamination shown in Figure 3-7 extends to the fence line.