

N62661.AR.002784  
NS NEWPORT  
5090.3a

LETTER AND COMMENTS FROM RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL  
MANAGEMENT ON DRAFT FINAL FEASIBILITY STUDY SITE 13 TANK FARM 5 NETC NS  
NEWPORT RI  
10/22/2012  
RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT



RHODE ISLAND  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

22 October 2012

Roberto Pagtalunan  
NAVFAC MIDLANT (Code OPTE3)  
Environmental Restoration  
Building Z-144, Room 109  
9742 Maryland Avenue  
Norfolk, VA 23511-3095

Re: Draft Final Feasibility Study  
Site 13, Tank Farm 5, NETC

Dear Mr. Pagtalunan,

The Office of Waste Management at the Rhode Island Department of Environmental Management has conducted a review of the *Draft Final Feasibility Study* dated September 2012 for Tank Farm 5 (Site 13), Naval Station Newport, located in Newport, RI. As a result of this review, this Office has generated the attached comments.

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](mailto: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  
Kymberlee Keckler, EPA Region I  
Deb Moore, NSN  
Steve Parker, Tetra Tech

**RIDEM's Comments (10/22/12)  
on the Draft Final Feasibility Study  
for DU 5-1 at Site 13, Tank Farm 5  
Naval Station Newport, RI**

**General Comments:**

**1. Fenceline**

A discussion of the fenceline is not included in this FS. RIDEM's understanding is that the Navy will address the fenceline as a separate Decision Unit (DU). As stated in the RPM meeting notes from 5/16/12, the Navy was to follow up with a letter regarding the fenceline issue. Please discuss this in the FS and send EPA and RIDEM a written agreement on how the Navy will address the fenceline.

**2. TPH**

Please ensure that any known exceedances of RIDEM's criteria for TPH for both residential and industrial/commercial scenarios are outlined in this FS. According to the dispute agreement dated April 24, 2012, the Navy agreed to address TPH along with CERCLA contaminants during the remedial actions. Please include text listing any known locations with exceedances, and include a separate figure showing any TPH exceedances for DU 5-1 only.

**Specific Comments:**

**1. p. ES-3, Executive Summary; groundwater alternatives.**

The Navy has not demonstrated to date that monitored natural attenuation (MNA) is a viable remedial alternative at this site. To show that natural attenuation of metals is occurring at this site, the Navy must have multiple rounds of groundwater data with seasonal variances showing decreasing trends. The summary of geochemistry information provided in Appendix A-5 is not enough to prove that MNA will be effective for this Site. Therefore, please include an additional groundwater alternative in this FS (i.e., in situ treatment).

**2. p. 3-20, Section 3.4, Evaluation of Technologies and Representative Process Options for Groundwater.**

Please include a groundwater treatment alternative in this section as requested in specific comment #1.

**3. p. 4-10, Section 4.3, Overall Protection of Human Health and the Environment; 2<sup>nd</sup> paragraph.**

*"...given that the hot-spot soil is only being moved to be managed elsewhere..."*

This statement appears to be from the Tank Farm 4 FS. Soil is not being moved from a hot-spot at Tank Farm 5. Please revise as necessary.

**4. Page 5-1, Section 5.0, Description and Detailed Analysis of Groundwater Alternatives.**

Please include a groundwater treatment alternative in this section as requested in specific comment #1.

**5. Page 5-2, Section 5.1.2, Alternative GW2, MNA; 4<sup>th</sup> paragraph.**

*“In order to provide documentation of the attenuation, an annual monitoring schedule is appropriate for the first five years, and if a trend of COC reduction appears evident, reduction to one monitoring event every five years would be adequate in order to support the 5-year review documentation.”*

Please see comment #1. Please revise this statement to state that quarterly monitoring is appropriate for the first several years to show seasonal trends.

**6. Table 2-3, Action-Specific ARARs and TBCs**

In Navy’s email on 7/6/12 which included the “TF5 Draft FS Issues Resolution”, the attached State ARAR table states that the Navy agreed to include RI Air Pollution Control Regulation No. 7 – Emissions Detrimental to Persons or Property, RIDEM, 7/19/07 as an applicable ARAR. Please include this ARAR in Table 2-3 in this FS.

**7. Table 2-3, Action-Specific ARARs and TBCs**

In Navy’s email on 7/6/12 which included the “TF5 Draft FS Issues Resolution”, the attached State ARAR table states that the Navy agreed to include the “direct discharges” portion of the Regulations for RI Pollutant Discharge Elimination Systems (RIPDES) as an applicable ARAR for this Site. Please include this ARAR in Table 2-3 in this FS.

**8. Table 2-3, Action-Specific ARARs and TBCs**

Please include the following sections of the RI Solid Waste Regulations as ARARs:  
1.7.14(b) – Closure, 1.8.01(a) and 1.8.01(b) – Groundwater Monitoring and Closure,  
2.1.08(a)(8) – Monitoring Wells, 2.1.08(c) – Long-Term Monitoring, 2.3.05 – Compliance Boundaries, and 2.3.11 – Monitoring Wells.