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LETTER REGARDING U S EPA REGION I REVIEW AND COMMENTS ON DRAFT TIER 2  
SAMPLING AND ANALYSIS PLAN FOR CODDINGTON POINT BURIED DEBRIS AREAS NS  
NEWPORT RI  
4/10/2013  
U S EPA REGION I



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
REGION 1  
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April 10, 2013

Dominic O'Connor  
Remedial Project Manager (Code OPTE3)  
Naval Facilities Engineering Command, Mid-Atlantic  
Building Z-144  
9742 Maryland Avenue  
Norfolk, VA 23511-3095

Re: Draft Tier II Sampling and Analysis Plan  
Coddington Point Buried Debris Areas  
NAVSTA Newport, RI  
January 23, 2013

Dear Mr. O'Connor:

EPA has completed its review of the "Draft Tier II Sampling and Analysis Plan, Coddington Point Buried Debris Areas, NAVSTA Newport, RI," dated January 23, 2013, as prepared by Resolution Consultants, on behalf of Naval Station Newport, RI (hereafter referred to as the Draft SAP).

Pursuant to the Navy's October 22, 2012 Revised FFA schedule and management-level discussions on the path-forward for the Coddington Point Buried Debris Areas investigation, the Navy's FFA commitment was to submit a Draft RI Work Plan for this site by January 26, 2013. The Draft RI Work Plan was to address both asbestos and other potential contaminants of concern (PCOCs) at the Site. The Draft SAP issued by the Navy is not an adequate RI Work Plan. The Draft SAP provides for an SI-level investigation of PCOCs and does not address RI-level investigation of asbestos. Significant revisions must be made to this Draft SAP for this to comply with the Navy's FFA obligation for issuance of a Draft RI Work Plan for the Coddington Point Buried Debris Areas. Because such significant revisions to the Draft SAP are needed for it to be considered an RI Work Plan for these sites, the Navy will need to issue the next version as a Revised Draft SAP – RI Work Plan, rather than a Draft Final document. As such, EPA and RIDEM should be allowed review times consistent with review of Draft primary documents under the FFA for this Revised Draft version once submitted.

Enclosed please find EPA's comments on the Draft SAP. If you have any questions, please contact me at (617) 918-1754 or at [lombardo.ginny@epa.gov](mailto:lombardo.ginny@epa.gov).

Sincerely,



Ginny Lombardo  
Remedial Project Manager

Attachments

cc: Pamela Crump, RI DEM  
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Mark Kauffman, Resolution  
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**EPA Comments on  
Draft Tier II Sampling and Analysis Plan  
Coddington Point Buried Debris Areas  
NAVSTA Newport, RI  
January 23, 2013**

**General Comments:**

1. The Draft SAP provides for an SI-level investigation of PCOCs. If Navy intends to conduct a phased effort for evaluation of the PCOC risks potentially co-located with the buried debris, the proposed sampling approach for the PCOCs in this Draft SAP may be adequate once revised to address specific comments below requesting additional sampling locations be considered. However, the proposed sampling approach for PCOCs will not delineate the extent of PCOC contamination. If the proposed PCOC sampling demonstrates levels of PCOCs above risk-based screening criteria, additional sampling will likely be required to adequately delineate the nature and extent of contamination and support RI-level investigation, decision-making and risk assessments. Further, the adequacy of the proposed locations of the soil borings will need to be re-evaluated following Navy's responses to these comments in support of the "estimated extent of demolition debris" areas depicted on Figures 4, 5 and 6.
  
2. During discussions on this Site held during the March 20, 2013 RPM meeting, Navy expressed its position that it intended to use the geophysical investigation and boring data to support delineation of the buried debris areas and make the assumption that any buried debris may contain asbestos. In this way, Navy intends to use the boundaries for the buried debris disposal areas, i.e., "estimated extent of demolition debris", as the boundaries for the asbestos-containing material (ACM) that will be subject to a response action due to potential asbestos exposure risk. In general, this may be an acceptable approach pursuant to the EPA Guidance "Framework for Investigating Asbestos-Contaminated Superfund Sites," dated September 2008 ([http://epa.gov/superfund/health/contaminants/asbestos/pdfs/framework\\_asbestos\\_guidance.pdf](http://epa.gov/superfund/health/contaminants/asbestos/pdfs/framework_asbestos_guidance.pdf)). A comparable approach was used at the Savannah River Site, a DOE Superfund Site in Aiken, SC, for the ECODS L-1, N-2, P-2, and R-1A, -1B, -1C Operable Unit. The December 2009 ROD for this site is attached for Navy's consideration. Although this approach may be acceptable, significant revisions will be required for the Draft SAP to document and support this decision-making logic for delineating the extent of asbestos contamination. Further, if this approach is pursued, the Draft SAP will need to provide justification to support that ACM does not extend beyond the boundaries of the buried debris areas and/or propose and justify a 'safety buffer' area beyond the delineated buried debris areas to conservatively address any ACM that may be present in the soils outside the buried debris footprint (i.e., to address asbestos fibers that may have been mixed into soils during demolition where debris was disposed).
  
3. Another critical component for the RI Work Plan for the investigation of ACM at the Coddington Point Buried Debris Areas is providing data and technical support that the ACM is only present in the subsurface and that the buried debris is adequately covered such that

there is no risk from asbestos exposure. Ultimately, the NESHAPs regulations will be an ARAR and the Navy will have to demonstrate compliance with 40 CFR § 61.151, among other parts of the NESHAPs regulations. If RIDEM has more stringent requirements, the Navy will need to comply with the more stringent regulations. Navy's data and technical analysis must support that ACM risks are not present in surface soils. Navy can potentially utilize geophysical data, boring data and observations, PCOC sampling/analytical data for surface soil, and/or asbestos sampling/analytical data for surface soil to support that the buried debris potentially mixed with ACM is covered with surface soil that does not contain asbestos and complies with the requirements of 40 CFR § 61.151. If data is not adequate to support that ACM is not present in surface soils, activity-based sampling may be required to evaluate human health risks from asbestos in surface soils. In this assessment, Navy should also consider whether frost-heaving could bring ACM to the surface over time.

4. The Revised Draft RI Work Plan must also address the "Draft Evaluation of Urban Fill Report" (January 2012), Section 6.2, item 3, which recommended "additional investigation of the MARDET Building #1112CP, specifically of the two six-inch diameter concrete remnants and the vegetated portion of the embankment."
5. The current and foreseeable future use of the site and availability of, or limitations to, site access will also need to be considered in evaluating potential asbestos exposure risks. The Revised Draft RI Work Plan should include a discussion on current and future use and access for each of the disposal debris areas.

#### **Specific Comments:**

1. SAP Worksheet #10, Operational History, Naval Supply School (Building 1112CP), Page 14-15 and Figure 4: Additional information needs to be added to this section to clarify the historical findings that lead to the delineation of the "estimated extent of demolition debris". Page 14 states: "To address the ACM, asbestos hazardous abatement plans were developed and implemented by the contractor." What ACM is this referring to and what was the timeframe of the ACM abatement efforts? Page 15 states that the "plans only addressed the ACM within the limits of the construction project; therefore it was concluded at that time that additional ACM and/or urban fill likely remains buried at the study area." What is the "construction project" that is referenced? Page 15 goes on to state: "In 2011, additional investigations, including geophysical survey and soil borings, were conducted. The 2011 investigation revealed the presence of debris but visual evidence did not indicate the presence of ACM." A figure should be added depicting:
  - the boundaries of the "study area",
  - the limits of the "construction project",
  - the boundaries of the 2011 geophysical investigation, noting whether any areas were not surveyed due to obstructions or other limitations,
  - locations of areas of concern (i.e., potential buried debris areas) determined through the geophysical investigation,
  - location of the 2011 soil borings (assumed to be the existing soil borings depicted as yellow circles on Figure 4), and

- location of debris determined through 2011 soil borings (assumed to be the yellow circles with red outer ring on Figure 4).

All of this historical information incorporated onto a figure should be discussed in a way to clearly support the “estimated extent of demolition debris” area for Navy Supply School that is depicted on Figure 4.

2. SAP Worksheet #10, Operational History, Combat Training Pool – Building 1357CP, Page 15 and Figure 4: Additional information needs to be added to this section to clarify the historical findings that lead to the delineation of the “estimated extent of demolition debris” depicted in Figure 4. A figure should be added depicting:

- the location of former structures, including Building 1120 and 1220, the 2,250,000-gallon UST, and the former paved parking lot constructed following demolition of Buildings 1120 and 1220,
- the boundaries of the construction area for the P-370 Combat Training Pool constructed in 2008,
- the locations of debris and ACM encountered during the 2008 construction activities,
- the boundaries of the asbestos hazardous abatement removal area which “removed the majority of ACM”,
- the boundaries of the area “covered with clean fill at completion” of the asbestos abatement removal effort,
- the boundaries of the 2011 geophysical investigation, noting whether any areas were not surveyed due to obstructions or other limitations,
- locations of areas of concern (i.e., potential buried debris areas) determined through the geophysical investigation,
- location of the 2011 soil borings (assumed to be the existing soil borings depicted as yellow circles on Figure 4), and
- location of debris determined through 2011 soil borings (assumed to be the yellow circles with red outer ring on Figure 4).

Page 15 states: “Buildings 1120 and 1220 were demolished between 1966 and 1973” and “the bottom of the reservoir is believed to remain about 6 feet below grade”. Were the demolished buildings and UST disposed on site? If so, the areas of disposal should also be depicted on the figure, if not already noted based on other data. All of this historical information incorporated onto a figure should be discussed in a way to clearly support the “estimated extent of demolition debris” area for Combat Training Pool that is depicted on Figure 4. Does the UST “bottom” that remains on site have any coating on the concrete that could result in a release?

3. SAP Worksheet #10, Operational History, P 451 New OTC Barracks, Page 15-16 and Figure 4: Additional information needs to be added to this section to clarify the historical findings that lead to the delineation of the “estimated extent of demolition debris”. A figure should be added depicting:

- the location of former structures, including Buildings 1221, 1231, 1125, 1800, 1933, 1914, the former parking lot, and Building 1287,
- the boundaries of the “geophysical survey conducted to support the design and siting of this building”,

- locations of “urban fill” (i.e., potential buried debris areas) determined through the geophysical survey,
- locations of the test pits that were excavated and “the limits of the project area”, and
- the location of “buried debris with ACM” determined through test pits.

Page 15 states: “these buildings were subsequently demolished between 1966 and 1973” and Building 1287 “remained on site until the New OTC Barracks construction began.” Were any of the demolished buildings disposed on site? If so, the areas of disposal should also be depicted on the figure, if not already noted based on other data. Page 16 discusses “development of an asbestos management plan... for the management and disposal of ACM encountered during construction” and states “buried debris and possible ACM exist in portions of the area where construction activities have not resulted in off-site disposal of the debris.” Although not stated in the text, it is clear that the construction of the New OTC Barracks did occur and resulted in the implementation of the asbestos management plan and soil removal and off-site disposal due to ACM. As such, the figure should also depict the construction footprint for the New OTC Barracks and the boundaries of all areas where soils were removed for off-site disposal during the construction activities as a result of ACM or for any other reasons. All of this historical information incorporated onto a figure should be discussed in a way to clearly support the “estimated extent of demolition debris” area for New OTC Barracks that is depicted on Figure 4. In addition, the dates for many of the historical activities should be added to the text, including the date of the geophysical survey, test pitting, New OTC Barracks construction and soil removal activities.

4. SAP Worksheet #10, Operational History, Nimitz Field Lighting, Page 16 and Figure 5: Additional information needs to be added to this section to clarify the historical findings that lead to the delineation of the “estimated extent of demolition debris”. A figure should be added depicting:
- the location of former structures, including Buildings 1130, 1230, 1140, 1330, 1420, 1540 and 1802,
  - the locations of the “fragments of friable thermal systems insulation (TSI) and non-friable cement-like material” encountered during the July 2010 utility trenching activities,
  - the boundaries of the area where “removal of the encountered contaminated soil and debris was performed,”
  - the boundaries of the 2011 geophysical investigation, noting whether any areas were not surveyed due to obstructions or other limitations,
  - locations of areas of concern (i.e., potential buried debris areas) determined through the geophysical investigation,
  - location of the 2011 soil borings (assumed to be the existing soil borings depicted as yellow circles on Figure 4), and
  - location of debris determined through 2011 soil borings (assumed to be the yellow circles with red outer ring on Figure 4).

Page 16 states: “these buildings were demolished between 1966 and 1973 and replaced with a recreation field.” Were any of the demolished buildings disposed on site? If so, the areas of disposal should also be depicted on the figure, if not already noted based on other data. All of this historical information incorporated onto a figure should be discussed in a way to clearly support the “estimated extent of demolition debris” area for Nimitz Field Lighting Area of Concern that is depicted on Figure 5.

5. SAP Worksheet #10, Operational History, Bishop's Rock Improvement Project and Recreation Area, Page 16-17 and Figure 6: Additional information needs to be added to this section to clarify the historical findings that lead to the delineation of the "estimated extent of demolition debris". A figure should be added depicting:
  - the location of the seawall/revetment and Building 998,
  - the locations where ACM was encountered in 2011 during the preparatory site work for the improvement project,
  - the location of the "(a)dditional suspect ACM" that "was encountered when excavation activities for construction of a pavilion was performed at Bishops Rock",
  - the boundaries of the excavation area for the improvement area,
  - the boundaries of the geotextile cap and 2-foot cover constructed in this area.Further, the report does not discuss the 2011 geophysical investigation and soil boring efforts and results. This information should be added to the text and depicted on the figure, as appropriate. All of this historical information incorporated onto a figure should be discussed in a way to clearly support the "estimated extent of demolition debris" areas for Bishop's Rock that are depicted on Figure 6. With respect to the area capped with the geomembrane and soil cover, Navy must demonstrate whether all ACM risks within this area were addressed through the removal action. If ACM remains in this area and the cap is to address remaining risks from ACM exposure, the capped area will need to be incorporated into the response action.
6. SAP Worksheet #11, Step 2 – Study Goals, Page 21: With respect to the "survey of Bishop's Rock recreational area", the SAP should reference Figure 7. The SAP indicates that, if debris is located here, "up to 4 soil sample locations may be added for the collection of soil samples in the same manner as the other areas." Refer to General Comment 1. In addition, EPA cannot concur that 4 soil samples will be adequate to support even an SI-level investigation for PCOCs in the potential debris areas without an understanding of the potential extent of buried debris areas. The Work Plan will need to provide for EPA and RIDEM review and comment on a proposal for additional soil samples following completion and distribution of the survey results and findings.
7. SAP Worksheet #11, Step 5 – Analytical Approach, Page 23: The Draft SAP references that analytical results will be compared to "available background data (if any) and applicable screening criteria." A table of background data and applicable screening criteria needs to be provided for EPA review. SAP Worksheet #15 includes Project Action Limits, but it is not clear that these are the screening criteria that will be used and background data are not included on this Worksheet.
8. SAP Worksheet #17, Field Screening, Page 33: The Draft SAP includes a discussion on measurements in the breathing zone of field staff to be made to evaluate potential health risks. Will these measurements evaluate asbestos risks from the planned sampling activities? Provide details on this sampling program.
9. SAP Worksheet #17, Soil Sampling, Page 33 and Figure 4: EPA requests additional sample locations be considered in the Navy Supply School area along the embankment (1-2

additional samples recommended), in the Combat Training Pool area to provide for adequate coverage (2-3 additional samples recommended), and in the New OTC Barracks area to provided for adequate coverage (2-3 additional samples recommended). See also General Comment 1.

10. SAP Worksheet #17, Soil Sampling, Page 34: The Draft SAP references “SOP 3-21”. Please correct this reference to “SOP 3-17” if for Direct Push Sampling Techniques or include SOP 3-21 in the SAP.
11. SAP Worksheet #17, Geophysical Survey, Page 34: The Draft SAP should describe the EM and GPR capabilities and limitations for detecting buried debris, particularly considering EPA’s General Comment 2.
12. SAP Worksheet #14, Subsurface Geophysical Survey, Page 35: Provide details on the grid spacing for the geophysical survey and clarify whether the entire area will be covered by the geophysical survey.
13. SAP Worksheet #14, Drilling and Soil Sample Collection, Page 35: Revise the term “BSG” to “BGS”. Delete the reference to “monitoring well locations”. Revise the reference to “Figures 3 and 4” to “Figures 4, 5 and 6”.