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TRANSMITTAL LETTER AND RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL
MANAGEMENT COMMENTS ON THE DRAFT PROPOSED PLAN FOR OPERABLE UNIT 6
(OU 6) SITE 17 FORMER BUILDING 32 GOULD ISLAND NS NEWPORT RI
6/14/2013
RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

14 June 2013

Ms. Maritza Montegross
NAVFAC MIDLANT (Code OPTE3)
Environmental Restoration
Building Z-144, Room 109
9742 Maryland Avenue
Norfolk, VA 23511-3095

Re: Draft Proposed Plan
Site 17 - Former Building 32 Gould Island
Naval Station Newport, RI

Dear Ms. Montegross,

The Office of Waste Management at the Rhode Island Department of Environmental Management has conducted a review of the *Draft Proposed Plan*, dated April 2013 for Former Building 32 Gould Island (Site 17), Naval Station Newport, located in Jamestown, RI. As a result of this review, this Office has generated the attached comments on the *Draft Proposed Plan*.

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.

Sincerely,

Pamela E. Crump, Sanitary Engineer
Office of Waste Management

cc: Matthew DeStefano, DEM OWM
Gary Jablonski, DEM OWM
Richard Gottlieb, DEM OWM
Deb Moore, NSN
Kymberlee Keckler, EPA Region I
Steve Parker, Tetra Tech
Lisa McIntosh, W&C
Lisa Campe, W&C

**RIDEM Comments (6/14/13) on the
Draft Proposed Plan (4/26/13) for
Site 17 – Former Building 32, Gould Island
Naval Station Newport, Jamestown, RI**

General Comments:

1. Please check the Proposed Plan (PRAP) for consistency with the Feasibility Study (FS), including the following:
 - p. 6, 1st sentence of 2nd column, reference to Appendix A. Please note that Appendix A in the FS includes historical documents but does not include a complete list of chemicals of potential concern (COPCs).
 - p. 8, Cleanup Objectives. The chemicals of concern (COCs) for different media provided in the PRAP are inconsistent with those in the FS. For example, pesticides are not specified as COCs in sediment in the FS.

Specific Comments:

1. p. 7, Step 1, Problem Formulation.

Please revise the beginning of the first sentence below the bullets to read: “Similar to the HHRA, COPCs were identified by comparing...”

2. p. 7, text box on Ecological Risk.

Ecological risk is not only defined by the Hazard Quotient. Please expand this text box to discuss the multiple lines of evidence used in the ecological risk assessment, including toxicity testing.

3. p. 9, Soil and Debris Alternative SO4.

As discussed in RIDEM’s evaluation of responses to comments on the Draft Final FS, the Navy may need to include the removal of debris contained in the five underground storage tanks (USTs) as part of this remedy if it is determined that these tanks were not closed out properly according to RIDEM’s UST regulations and the debris contained in the tanks consists of material other than clean fill.

4. p. 10, 2nd column, bottom of page.

Please change to “*The following three cleanup options were evaluated for offshore sediment (SD):*”

5. p. 11, Off-Shore Sediment Alternative SD2.

Due to the sensitive nature of the northeast shoreline area, a cover would not be practical due to potential damage of the eel grass beds. RIDEM suggests that based on the results of the PDI investigation, if PRGs exceedances are found, the Navy's should dredge the area according to Alternative 3 and restore the eel grass beds to the best extent possible, or continue with long-term monitoring as originally suggested.

6. p. 15, Table 2.

Both Alternatives GW2 and GW3 would appear to be technically feasible (in particular, GW2). Please revise this table to indicate that these alternatives meet the criteria for Implementability.