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TRANSMITTAL LETTER AND U S EPA REGION I COMMENTS ON THE REDLINE FINAL
FEASIBILITY STUDY FOR OPERABLE UNIT 6 (OU 6) SITE 17 FORMER BUILDING 32
GOULD ISLAND NS NEWPORT RI
10/30/2013
U S EPA REGION I



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION I

5 Post Office Square, Suite 100
Boston, MA 02109-3912

October 30, 2013

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

Re: Redline Final Feasibility Study for Site 17, Gould Island

Dear Ms. Montegross:

Thank you for the opportunity to review the Redline Final *Feasibility Study for Site 17, Gould Island*, dated August 2013 (FS). This FS updates the Draft Final FS to include an active groundwater remedy. This letter replaces the preliminary comments sent September 17, 2013. Detailed comments are provided in Attachment A.

As discussed on October 29, 2013, EPA believes that SD-3 is the LEDPA as it permanently removes contaminants from the environment. With SD-2, there is the risk of erosion of the cap or diffusion of contaminants through the cap. The short-term impacts associated with either burial or dredging will likely be addressed over time as the area recolonizes. This comment affects Tables 5-5, 5-8, and 5-10.

EPA also assumes that the groundwater MNA alternative will be appropriately revised based on the new calculation sheets submitted yesterday (*i.e.*, new flushing and conductivity information).

I look forward to working with you and the Rhode Island Department of Environmental Management toward the cleanup of the Gould Island. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Kimberlee Keckler".

Kimberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: Pamela Crump, RIDEM, Providence, RI
Deb Moore, NETC, Newport, RI
David Peterson, USEPA, Boston, MA
Chau Vu, USEPA, Boston, MA
Bart Hoskins, USEPA, Boston, MA
Ken Finkelstein, NOAA, Boston, MA
Steven Parker, Tetra Tech-NUS, Wilmington, MA

ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. ES-6	For Alternative SO-3, clarify whether long-term monitoring of the solidified/stabilized is included in the remedy to ensure the long-term protectiveness of the remedy.
p. 1-20, §1.8.3	The degradation of PCP presented in the graph appears to be exponential, not linear. Please revise.
p. 1-20, §1.8.3, ¶2	Copy the discussion from the Executive Summary (p. ES-5) that describes the source of manganese in groundwater here.
p. 1-29, §1.10.5, ¶1	Please edit the last sentence to read: "... site, design and construction will be conducted to address this data gap."
p. 2-5, §2.1.4.1, ¶1	Qualify the discussion of test pit water to specify that if the test pit depth is above the groundwater elevation it is referred to as test pit water, but if the test pit depth is below the groundwater elevation it must be considered and managed as groundwater.
p. 2-5, §2.1.4.1, ¶3	Please edit the second sentence to read: "Because Rhode Island does not have an approved Comprehensive State Groundwater Protection Program, groundwater classifications from the RIDEM Groundwater Regulations are not applicable at CERCLA sites. EPA recognizes State groundwater cleanup standards for drinking water, from the RIDEM Remediation Regulations, as chemical-specific ARARS if they are more stringent than federal standards for the identified COCs considered during the identification of chemical-specific ARARS."
p. 2-6, §2.1.4.3, ¶1	In the fifth sentence, remove "and working within coastal zones" since the coastal zone regulations are location-specific ARARS.
p. 2-10, §2.2.1.3, ¶1	Please clarify the last sentence to read: "... within TPs located above the groundwater elevation." if that is correct.
p. 2-17, §2.4, ¶2	Change the last sentence that discusses groundwater to: "For the purposes of this FS, a contaminated groundwater volume of XX gallons has been used for evaluating the alternatives." If any of the sump/test pit water is below the groundwater level include it in the volume of groundwater addressed by the remedy.
p. 2-18, 5 th bullet	Identify the volume of contaminated soil that will be addressed within this subarea.
p. 2-18, §2.4	Add a paragraph at the bottom of the page to specify the extent of the Site that will be addressed for the residential exposure scenario either by area or volume of soil addressed by the remedy.
p. 2-20, ¶2	Add a new last sentence: "As part of the PDI, the Northeast Shoreline will be sampled to determine the presence of any contamination requiring remedial action."
p. 4-2, §4.1.1	Please add a sentence acknowledging that five-year reviews are required for Alternative SO1 because contamination has been left in place at concentrations that create excess risk for

unrestricted site use.

- p. 4-3, ¶3 Regarding the last sentence of the new redlined text, clarify “addressed accordingly.” Specify whether all subsurface soil exceeding a particular standard will be removed and disposed offsite or will the concrete be sealed and an IC put on the area to prevent removal of the concrete cover or some other option?
- p. 4-3, ¶4 At the beginning of the second sentence, insert: “Although not part of the CERCLA remedial action,” and add at the end of the sentence: “to meet State regulatory standards.”
- p. 4-4, ¶4 Change the first new redlined sentence to: “As part of a separate agreement with the State regarding the Navy’s achieving State compliance standards, the Navy will conduct concurrent TPH sampling during the CERCLA cleanup.”
- p. 4-5, §4.1.2, ¶1 In the first sentence after “, loaded” add “into closed containers.” If the contaminated material is just loaded straight into the barge, include additional details about the onshore facility where the barges would be off-loaded and measures to prevent release of contaminants during transport, as well as decontamination of the barges.
- p. 4-5, §4.1.2, ¶2 Please edit the last sentence to read: “... site, design and construction will be conducted to address this data gap.”
- p. 4-5, §4.1.2, ¶3 Add standard language to this paragraph regarding how LUC restrictions will be transferred if the Navy were ever to transfer the property to either a federal or non-federal entity (see groundwater section).
- p. 4-7, ¶4 In the first sentence after “, loaded” add “into closed containers.” If the contaminated material is just loaded straight into the barge, include additional details about the onshore facility where the barges would be off-loaded and measures to prevent release of contaminants during transport, as well as decontamination of the barges.
- p. 4-9, ¶5 In the first sentence after “, loaded” add “into closed containers.” If the contaminated material is just loaded straight into the barge, include additional details about the onshore facility where the barges would be off-loaded and measures to prevent release of contaminants during transport, as well as decontamination of the barges.
- p. 4-10 , §4.2.1 Please add a sentence acknowledging that five-year reviews are required for Alternative SO1 because contamination has been left in place at concentrations that create excess risk for unrestricted site use.
- p. 4-11, ¶1 After “construction workers” add “or future residents/recreational users.”
- p. 4-21, Table There would be Five-Year Review costs for SO1 (see how this was addressed for the no action groundwater alternative).
- p. 5-1, §5.0 Please edit SD1 to read: “No remedial action would be conducted other than statutory Five-year reviews.

For SD2, habitat restoration should be added as a component of the alternative both because it may be required if the Northeast Shoreline needs to be covered and because habitat restoration/mitigation will be required for covering the Stillwater Basin sediments (included in SD3). SD2 also requires long-term monitoring and potential maintenance of the cover.

For SD3, please correct the second bullet to read: “Dredging in affected portions of the Stillwater area to achieve PRGs;”

- p. 5-2, §5.1.2 For SD2 habitat restoration/mitigation will be required for areas that are covered. Specify whether adding two feet of cover in any areas convert subtidal habitat to intertidal habitat or intertidal habitat to upland.
- p. 5-4, §5.1.2, ¶3 Please insert the missing length dimension in the first paragraph.
- p. 5-4, §5.1.2, ¶5 Add standard language to this paragraph regarding how LUC restrictions will be transferred if the Navy were ever to transfer the property to either a federal or non-federal entity (see groundwater section).
- p. 5-7, §5.1.3, ¶3 Please revise the edited text to: “... above PRGs, sediment at those locations would be removed to achieve the PRGs.”
- p. 5-7, §5.1.3, ¶5 There is more detail presented for the sediment remedy on “Transportation and Disposal” than for the soil alternatives. Will a ramp need to be upgraded/installed for the soil alternatives also? For the soil alternatives, this would trigger location-specific ARARs for doing work in wetlands (Section 404 of the CWA and State wetlands regulations). Also for both the soil and sediment remedies, if a ramp at Davisville/Quonset will need to be upgraded that will trigger federal/state permitting requirements that should be discussed under the Implementability criterion.
- p. 5-8, §5.2.1 State that Five-year reviews are required for Alternative SD1 because contamination has been left in place at concentrations that create excess risk for unrestricted site use.
- p. 5-10, Table Add Five-Year Review costs to the Table (see how this was addressed for the no action groundwater alternative).
- p. 5-10, §5.2.2 For SD2, habitat restoration/mitigation may be required for areas that are covered, particularly for any areas converted from subtidal to intertidal or in any eelgrass areas.
- p. 5-10, §5.2.2, ¶3 Specify that SD3 is the “Least Environmentally Damaging Practicable Alternative” under the federal Clean Water Act.
- p. 5-12, ¶1 Remove “for the 30-yr life of the project.”
- p. 5-12, Table Include the Five-Year Review costs back in the Table?
- p. 5-12, §5.2.3 The impacts from transportation and material handling on the island (sediment dewatering; building/upgrading a ramp; any material handling facilities needed on the island; potential permitting of an off-loading ramp at Davisville) also need to be evaluated as part of this alternative.
- p. 5-13, ¶3 Monitoring of any habitat mitigation/restoration implemented as part of this alternative may be required.
- p. 5-13, ¶4 Specify that SD3 is the “Least Environmentally Damaging Practicable Alternative” under the federal Clean Water Act.
- p. 5-14, ¶2 If any amendments are added to the sediment to dewater/stabilize it that constitutes limited treatment.

- p. 5-16, §5.3, ¶3 Please correct the first sentence to read: “Implementation of Alternative SD3 could be more damaging to the ecosystem if additional dredging were conducted in areas where eelgrass is known to exist,....”
- Please clarify the last sentence. The target is sediment not necessarily just surface sediment. The goal is to define the extent if any of impacted sediment and to assess if and/or how much the eelgrass beds may be impacted.
- p. 5-17, ¶3 Identify SD3 as the “Least Environmentally Damaging Practicable Alternative.”
- p. 5-17, ¶5 If any amendments are added to the dredged sediment to dewater/stabilize it that constitutes limited treatment.
- p. 5-18, §5.3, ¶2 Please revise the last two sentences, by combining them as follows: “Alternative SD2 would be easier to implement than Alternative SD3 owing to the simpler components of the sediment cover layer, the avoidance of transportation and disposal issues related to dredged sediment.”
- SD3 will also have more implementability issues with transportation and material handling on the island and at Davisville (off-site permitting issues) if an off-loading ramp is needed.
- p. 5-18, Table Five-Year Review costs need to be included for SD1 (see how this was addressed for the no action groundwater alternative).
- p. 6-1, §6.0 The title of Alternative GW3 used differs from the title used on page 3-41. Please make the title consistent throughout the document. Section 3 evaluated and retained Enhanced Bioremediation.
- p. 6-4, §6.1.2 Please clarify the intent regarding monitoring for organic COCs by editing the first full sentence on the page to: “... and as such, after the first five years of annual monitoring a reduction to one monitoring”
- p. 6-7 , §6.1.3, ¶4 Please correct the time frames as they are not consistent. Injections are two years apart, so PRGs should not be achieved within two years of the pilot study.
- p. 6-14, §6.2.3 Please discuss MNA (in particular how long treatment and MNA will take to achieve groundwater cleanup standards).
- p. 6-16 , §6.2.3, ¶1 Please review the partial sentence at the top of the page. One month does not appear to be sufficient time for the second injection to have an effect on all site groundwater based on the spacing of the treatment zones. Please correct.
- Table 2-2, p. 2 For the Clean Water, Section 404 Consideration insert after “dredging” the text: “, construction/upgrading of shoreline transportation/material handling facilities,”.
- Table 2-3 For GW3, add federal and state groundwater injection standards (cited in Table 6-10).
- Table 2-3, p. 2 The CWA NRWQC standards would be used for any water quality monitoring required, not just for dredging (also for capping and any work installing/upgrading the ramp needed on the island).
- Table 2-3, p.5 State Water Quality standards would be used for any water quality monitoring required, not just for dredging (also for capping and any work installing/upgrading the ramp needed on the island).

- Table 3-3 Please ensure the table is consistent with the discussion and conclusion in Section 3, where bioprecipitation is discussed as a component of enhanced bioremediation.
- Table 4-5 (and all other soil location tables) If the alternative will requires a ramp on the island for the off-site disposal of contaminated soils, then federal and state wetlands standards (see sediment tables) should be cited for any shoreline work in the intertidal zone. Any work on bulkheads would also trigger the requirements.
- Tables 4-10 to 4-12 Please revise the titles: SO4 is not Full Excavation as noted in previous comments.
- Tables 5-5, 5-8 The Navy has selected SD2 as the least environmentally damaging practicable alternative although it is not clear that is correct. SD3 is the LEDPA because it permanently removes contaminated sediment and the short-term impacts of dredging areas in SD3 versus covering them in SD 2 are not that different.
- Table 5-8 The location-specific ARARs also pertain to the construction/upgrade of any shoreline off-loading ramp needed for the alternative and any work on bulkheads.
- Table 5-10 Regarding Environmental Protection, the FS states that SD3 is destructive initially, but the same comment should also be applied to SD2 that also destroys the existing ecosystem with a cover. Either apply this comment to both alternatives or delete it for SD3. Similarly, SD3 is said to damage eelgrass if sediment removal is required. Eelgrass may also be damaged by SD2 if a cover is required. Please edit the text throughout the FS where applicable.
- Table 6-8 Please supplement the line items to indicate the time frame for achievement of the PRGs for GW3.
- Appendix D The calculation sheets have been omitted from this appendix. Please include them. Please clarify where pre-excavation sampling will be conducted. It appears that pre-excavation sampling would be warranted at Areas 2 and 6 that are defined only by a single sample.