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TRANSMITTAL LETTER AND U S EPA REGION I COMMENTS ON THE U S NAVY
RESPONSES TO COMMENTS ON THE REDLINE DRAFT FINAL FEASIBILITY STUDY FOR
OPERABLE UNIT 6 (OU 6) SITE 17 FORMER BUILDING 32 GOULD ISLAND NS NEWPORT

RI

12/17/2013

U S EPA REGION I



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION I

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

December 17, 2013

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

Re: Responses to EPA's Comments on the Redline Draft Final Feasibility Study for Site 17, Gould Island

Dear Ms. Montegross:

Thank you for the opportunity to review the November 22, 2013 responses to EPA's October 30, 2013 comments on the Redline *Draft Final Feasibility Study for Site 17, Gould Island* dated August 2013 (FS). The FS updates the Draft Final FS to include an active groundwater remedy and to address EPA and RIDEM comments. Detailed comments are provided in Attachment A.

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

Sincerely,

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	If contamination is stabilized in place, long term monitoring is required to ensure the contamination does not migrate.
p. 1-29, §1.10.5, ¶1	The statement added to the end of this paragraph is not adequate to address the lack of vapor intrusion data. There needs to be a trigger to evaluate the vapor intrusion risk or to design and construct any building to prevent vapor intrusion. None of the groundwater remedies presented address this issue. Please edit the groundwater remedies to include a requirement to evaluate vapor intrusion risk in the land use controls should site development occur or to design and construct any building to prevent vapor intrusion.
p. 2-5, §2.1.4.1, ¶1	Based on the response, it appears that the Navy does not know whether the water in the test pits is groundwater. Therefore the text in the FS stating that there is no hydraulic connection between the test pits and the groundwater should be deleted unless the Navy has documented that no hydraulic connection exists. EPA agrees that the most appropriate way to evaluate groundwater at the test pits would be to sample local groundwater. The FS should reflect the intent.
p. 2-10, §2.2.1.3, ¶1	Please refer to EPA's comment on p. 2-5, §2.1.4.1, ¶1.
p. 4-5, §4.1.2, ¶2	Please refer to EPA's comment on p. 1-29, §1.10.5, ¶1.
p. 5-1, §5.0	Please include the response information relative to SD-2 in the FS.
p. 5-12, ¶1	Please delete the citation in the partial sentence at the top of the page.
p. 5-12, Table	Please either add a footnote for this and other tables noting that the five-year review costs are included with the soil alternative costs, or edit the description of the five-year reviews for the soil alternatives to acknowledge that those costs also include five-year reviews for the sediment alternatives.
p. 5-12, §5.2.3	How does the response address the comment? Please include the appropriate discussion in the evaluation of the alternative.
p. 5-12, §5.2.3	Please specify whether a sediment dewatering operation or stockpiling area needs to be established on the island under this alternative. Descriptions of any island operations (and any associated ARARs requirements) need to be discussed and evaluated.
Appendix D	The cost estimate for each soil alternative includes pre- and post excavation sampling, but there is no discussion of pre-excavation sampling. Why have Areas 2 and 4 been selected for pre-excavation sampling? Pre-excavation sampling would be warranted at Areas 2 and 6 that are defined only by one sample. Please clarify each alternative to discuss where pre-excavation sampling will be conducted and why. Explain why pre-excavation sampling is not warranted at other areas. Please also submit the calculation sheets if they changed since the December 2012 Draft Final FS or state that they have not been revised since then, if correct.