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TRANSMITTAL LETTER REGARDING DRAFT FINAL PROPOSED PLAN SITE 17 GOULD
ISLAND FORMER BUILDING 32 WITH ATTACHEMENT NS NEWPORT RI
2/14/2014
TETRA TECH



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C-NAVY02-14-5315W

February 14, 2014

Ms. Kymberlee Keckler
United States Environmental Protection Agency Region 1
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912

Ms. Pamela Crump
Office of Waste Management
Rhode Island Department of Environmental Management
235 Promenade Street
Providence, Rhode Island 02908-5767

SUBJECT: Transmittal of the Draft Final Proposed Plan,
Site 17: Former Building 32 at Gould Island
Naval Station Newport, Newport, RI

Dear Ms. Keckler and Ms. Crump:

On behalf of Ms. Maritza Montegross, U.S. Navy NAVFAC, I am providing the Draft Final Proposed Remedial Action Plan (PRAP) for Site 17 at Naval Station Newport, which is also known as Operable Unit (OU) 6 of the NETC Superfund Site, Newport, Rhode Island.

This Draft Final PRAP was prepared based on the comments to the draft PRAP (response to comments letter dated January 27, 2014), the agreements made at meetings held in January 2014 regarding the proposed remedy, and revisions to the Feasibility Study submitted on February 7, 2014. Please note that in a few cases, some adjustments were made to the revisions as they were cited in the response to comments, for clarity, as described in Attachment 1 to this transmittal letter.

If you have any questions regarding this material, please do not hesitate to contact me at 978-474-8434.

Very truly yours,


James Forreli, PE
Project Manager

Enclosures

c: D. Barclift, NAVFAC (w/encl.)
S. Bird, NAVFAC (w/encl.)
G. Glenn, TtNUS (w/o encl.)
W. Johnson, NAVFAC (w/encl.)
L. McIntosh, Woodward & Curran (w/encl.)
M. Montegross, NAVFAC (w/encl.)
P. Steinberg, Mabbett Associates (2- w/encl.)
D. Moore, NAVSTA (w/encl.)
Administrative Record (c/o RDM Data Manager, Tetra Tech) (w/encl.)
File 112G04295-8.0 (w/encl.), 3.1 (w/o encl.)

ATTACHMENT 1
Letter Dated February 14, 2014

Notes on compilation of the Draft Final Proposed Plan:

The Draft Final Proposed Plan was prepared to reflect revisions to the Feasibility Study (FS), responses to comments, and agreements made regarding minor changes to the described remedies. Tables were added, with appropriate references, the PDI step was replaced with a limited monitoring effort, and the estimated MNA duration to achieve goals was revised.

Due to the number of changes, the Draft Final Proposed Plan is not provided as a redline document. However, revised text that was requested and agreed to in the responses to comments (dated January 27, 2014) is presented in red font within the document. In the later stages of technical review, some of the requested changes to text were revised slightly for clarity and context, but without change to the intended meaning of the requested revision. Those revisions that were not made verbatim as compared to the response to comments are described below (referencing comment numbers from the January 27, 2014 response letter):

Comment 20: The comment response stated that the balancing statement would be included: “where it appears to be affecting groundwater.” The text revision was adjusted in the first sentence describing Alternative SO2 as cited below:

“This alternative would include excavation of surface soil that exceeds the PRGs based on industrial use of the site, excavation of soil exceeding leachability criteria and leaching COCs in the saturated zone, and...”

Comments 21 and 23: The comment response stated that the revision would state: “Long-term monitoring will document that soil contamination does not migrate into the groundwater or adjacent sediments.” The text revisions were adjusted as cited below and are provided in the explanations of Alternatives SO2, SO3, and SO4:

“Long-term monitoring will document that subsurface soil contaminants exceeding the cleanup goals do not migrate to groundwater or marine sediment.”

Comment 27: The comment response stated that the following revision would be made: “If it is determined that natural attenuation of manganese is occurring at an acceptable rate, the Navy would...”. However, the final text revision is revised as follows:

“If it is determined that natural attenuation of manganese and organics is occurring at an acceptable rate, the Navy would...”.