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LETTER AND ATTACHED U S EPA REGION I COMMENTS REGARDING THE DRAFT FIVE YEAR REVIEW REPORT FOR THE NAVAL EDUCATION AND TRAINING CENTER SUPERFUND SITE IN NS NEWPORT RI (PUBLIC DOCUMENT)
07/11/2014
U S EPA REGION I BOSTON MA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION I
5 Post Office Square, Suite 100
Boston, MA 02109-3912

July 11, 2014

Mr. James Gravette
Remedial Project Manager
Environmental Restoration
NAVFAC MIDLANT OPNEEV
Bldg. Z-144
9742 Maryland Avenue
Norfolk, VA 23511-3095

Re: Draft Five-Year Review Report for the Naval Education and Training Center Superfund Site in Newport, RI

Dear Mr. Gravette:

Thank you for the opportunity to review the Draft *Five-Year Review Report* (FYR) for the Naval Education and Training Center Superfund Site in Newport, RI dated June 13, 2014. EPA reviewed the FYR in light of EPA's *Comprehensive Five-Year Review Guidance; Close Out Procedures for National Priorities List Sites*; and OSWER 9200.2-11, *Clarifying the Use of Protectiveness Determinations for Comprehensive Environmental Response, Compensation, and Liability Act Five-Year Reviews*. The FYR discusses sites for which remedial actions are underway or completed and summarizes sites for which remedial decisions have not been made or were only recently completed. Detailed comments are provided in Attachment A.

Please specify that the Navy is the lead agency, identify in the narrative when the review was initiated and completed, and include the site interviews. The protectiveness statements must be in the narrative for each OU, not solely in the summaries.

Any OUs with signed RODs before the FYR is finalized in December should be discussed in this document. Add sections (after Section 4) for OUs 2, 5, 6, 11, and 12. Note that there are ARARs cited in a number of the Sites' RODs that either no longer exist or have been changed, but none affect the protectiveness of the remedy. Any future decision documents may be used to update these ARARs.

Issues were identified in the pictures. Please discuss them in the narrative and explain how and when they will be fixed.

Consistency should be used throughout the FYR. The document should be clearer when discussing OU1 and OU4. For example, the FYR interchanges Site 1 and OU1. Further the FYR often switches terminology between sites and OUs. Please include a table that lists all OUs with its corresponding site.

As commented further in Attachment A, EPA notes that the discovery of asbestos at NUSC could affect future protectiveness of the remedy. EPA believes that an Explanation of Significant Differences (ESD) is warranted to add asbestos requirements to the remedial action.

Lastly, EPA would like to reiterate its request to receive timely monitoring data and trend analyses. As you know, it has taken longer than expected to finalize the long-term monitoring reports for the McAllister Point Landfill. In order to ensure that we are effective in our FYR recommendations, it is essential that the Navy provide EPA and RIDEM with timely information related to the performance of its implemented remedies. Similarly, EPA notes that there are several locations within the FYR (*e.g.*, Sections 2.4.2.1, 2.4.2.2, and 2.4.2.3) where 2013 data are missing and expects to see a summary of these data before the draft final FYR is issued.

The missing data can be addressed by summarizing the draft Monitoring Report Data, stating explicitly it is draft. Otherwise, the protectiveness findings may need to be changed to "short-term protective" because the data are missing.

I look forward to working with you and the Rhode Island Department of Environmental Management to ensure that the remedies in place remain protective of human health and the environment. Please contact me at (617) 918-1385 with any questions.

Sincerely,

Kymberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: William Lovely, USEPA, Boston, MA
David Peterson, USEPA, Boston, MA
Monica McEaddy, USEPA, Washington, DC
Benjamin Simes, USEPA, Washington, DC
Pam Crump, RIDEM, Providence, RI
Darlene Ward, NETC, Newport, RI
Steven Parker, Tetra Tech-NUS, Wilmington, MA

ATTACHMENT A

Page	Comment
p. xi	As further discussed below, EPA commented on *the 2012 Draft Annual Monitoring Report* in a letter dated July 3, 2013. Because some of these comments raise questions about the impact of settlement of the landfill cap on groundwater interpretations and cap integrity, while others raise questions about the interpretation of the landfill gas/ air monitoring results, EPA cannot concur that the remedy is protective in the long-term until these issues are addressed.
p. xi	Revise the list of OUs with no issues to include all of the OUs with RODs by the December 2014.
p. xi	To the OU7 Recommendation text, insert: "and incorporate measures to address the risks posed by the asbestos into the remedial action."
p. xi	The OU1 Protectiveness Statement should also include: "Fencing remains in place to restrict access and land use controls are in place and are enforced to prevent unauthorized use of the site."
p. xi	Add a section for OU2. Discuss completion of the interim groundwater remedy (as discussed in the last FYR). The interim remedy is not complete until the Navy issues a final ROD for the site. Regarding the 2013 ROD, the FYR also needs to state: "The remedy at OU2 will be protective of human health and the environment upon completion. Land use controls are in place and are enforced to prevent unauthorized use of the site."
p. xii	For the OU4 Protectiveness Statement, please clarify what is meant by "…and elevated risk off-shore marine sediment remedial action (OU4) are complete…." Have RGs been achieved in the off-shore sediments and monitoring is no longer required? If so, does OU4 need to be evaluated as part of the FYR? Does the last sentence refer to shoreline monitoring where contaminated sediments were covered either with rip rap as part of the remediation?
p. xii	For OU7, how was the Remedial Action Work Plan revised to ensure that asbestos protectiveness standards are met? Is all soil handled as potentially containing asbestos or is the exposed/excavated soil tested to determine whether it contains asbestos?
p. xii	Please modify the protectiveness statement for OU3 based on the current project status and expand on the rationale for the determination. This remedial action will be completed before the FYR is completed.
p. xii	Add: "Land use controls are in place and are enforced to prevent unauthorized use of the site." to the OU3 Protectiveness Statement.
p. xii	Add a section for OU11 and state: "The remedy at OU11 will be protective of human health and the environment upon completion. Land use controls are in

	place and are enforced to prevent unauthorized use of the site."
p. xii	Add sections for Gould Island (OU6) and the two Derecktor OUs (OU5 and OU12) since these RODs will be signed before the FYR is finalized in December. Use the same language as suggested for OU11, above.
p. 1, §1.0	Add discussions for OU2, 11, 5, 12, and 6. Establishing LUCs at these OUs is sufficient for the start of remedial action. Remove the last sentence.
p. 2, §1.1	The last paragraph states that the Navy is considering an ESD to the Decision Unit 5-1 Record of Decision (ROD) to close out Tanks 53 and 56 in Tank Farm 5. An ESD cannot be used for this purpose. A Final ROD is required for Tanks 53 and 56 to document a No Further Action decision. This decision is not linked to DU 5-1.
p. 3, ¶2	As previously noted, any OUs with signed RODs before the FYR is finalized in December should be discussed here and removed from the bulleted list (OUs 2, 5, 6, 11, and 12).
p. 3, §1.1	In the bulleted list, please refer to Tank Farm 4 DU 4-1 and Tank Farm 5 DU 5-1 because the RODs for these sites are restricted to those decision units only. Please refer to Tank Farm 4 DU 4-1 and Tank Farm 5 DU 5-1 because the RODs for these sites are restricted to those decision units only.
p. 3, bullet 9	It is unclear what the term "closed" refers to in the OU8 discussion. If the Navy conducted a removal action to remove the risks, a No Further Action ROD is required.
p. 3 bullets	Have additional study sites been added, that should be identified here, to evaluate potential asbestos releases that aren't within existing study areas?
p. 5, ¶2	Change the last sentence to: "RIDEM has established a state groundwater classification system to protect its groundwater resources, and under this system, McAllister Point Landfill, Gould Island, Tank Farm 3, Tank Farm 4, Tank Farm 5, Carr Point Storage Area, Carr Point Shooting Range, and a portion of NUSC Disposal Area are within RIDEM's GA groundwater classification area, which designates the groundwater as being presumed suitable for public or private drinking water use without treatment. However, per EPA groundwater remediation guidance, in states without an EPA-approved Comprehensive State Groundwater Protection Program (CSGWPP) such as Rhode Island, CERCLA groundwater remediation must meet federal drinking water standards (i.e., MCLs and non-zero Maximum Contaminant Level Goals ([MCLGs]) and risk-based standards, or more stringent state groundwater standards, unless the water is non-potable.
p. 6, §1.2.2, ¶1	In the last sentence, please refer to Tank Farm 4 DU 4-1 and Tank Farm 5 DU 5-1 because the RODs for these sites are restricted to those decision units only. After "Tank Farm 5," insert "Gould Island, Derecktor Shipyard Off-Shore, Derecktor Shipyard On-Shore."

p. 6, ¶2	Add individual sections for OUs 2, 5, 6, 11, and 12.
p. 6, §1.2.2, ¶1	In the last sentence, please refer to Tank Farm 4 DU 4-1 and Tank Farm 5 DU 5-1 because the RODs for these sites are restricted to those decision units only.
p. 8, §1.3, ¶1	Please note that the final FYR will be made available on-line and cite the access address.
p. 8, §1.3, ¶2	Please update the last sentence regarding the number of questionnaires received. Also update the subsequent paragraphs, as appropriate, that discuss the content of the responses.
p. 13, Table 2-1	Please update the table with recent events/documents since November 2013.
p. 16, §2.2, ¶1	Please correct the second full sentence and confirm that no text is missing.
p. 24, ¶5	See questions above about the status of the sediment monitoring. Ensure the text is consistent between this section and page xii.
p. 27, §2.4.1	The site inspection discussion does not mention the condition of the revetment. Please supplement this section with observations related to the revetment. Also, please add appropriate photographs showing the condition of the revetment in Appendix C. EPA's July 3, 2013 letter raised concern about areas within landfill cap that have settled more than 6 inches and asked the Navy to investigate the impact of this settlement on cap integrity or groundwater monitoring well elevations. This section should acknowledge this concern and any associated follow-up.
p. 28, §2.4.2.1	The FYR covers 2009 through 2014, yet the report only presents data through 2012 and some of that data is questionable based on comments presented in EPA's July 3, 2013 letter. The lack of data for the entire review period makes it difficult for EPA to conclude anything beyond a remedy that is protective in the short-term. Please ensure the discussions for all sections for McAllister Point are updated to include the results of that monitoring event. Clarify that the exceedance of groundwater standards noted in the second paragraph is within the landfill and not beyond the groundwater compliance boundary. If it is outside of the compliance boundary, the remedy cannot be considered protective. In its July 3, 2013, EPA recommended that the Navy develop a plan to address MW-111S, MW-103R, and MW-103S, which have been either historically dry or recharge too slowly for collecting a groundwater sample. Navy has yet to respond to this comment, which suggests that this is an outstanding issue that will need to be captured as an action item for follow-up in Section 2.7 of this FYR.
p. 30, §2.4.2.2	In its July 3, 2013 letter, EPA raised concerns about: (1) the lack of ambient air monitoring in 2011 and 2012 and (2) the representativeness of the landfill gas data given the very short time interval recorded between the samples. Since there has been no resolution to these concerns (either in a *Final 2012 Annual Monitoring*

	Report or in an expanded Section 2.4.2.2), EPA cannot conclude that the remedy is protective in the long-term. Navy should either address this issue prior to finalizing this FYR, or list it as an action item for follow-up in Section 2.7 of the report.
p. 30, §2.4.2.2, ¶1	Please delete the reference to Section 2.4.2.2 (this section) in the fourth sentence and correct the sentence.
p. 31, §2.4.2.3, ¶4	Contrary to the conclusion in the first bullet, the 2009 FYR indicated that increasing trends were observed at multiple sampling stations. If those trends or conclusions are no longer correct, please provide the supporting documentation for the conclusion presented herein. However, because only the 2013 monitoring event has been conducted since 2009, one event cannot reverse the trends noted in 2009. Please correct as appropriate. In the second bullet, please discuss the supporting rationale for the conclusion presented.
p. 32, §2.4.2.3, ¶1	Note that the first bullet refers to mean concentrations. It should also discuss any individual exceedances and their significance.
p. 32, §2.4.4	This section should also discuss the Land Use Control Remedial Design for the site and its implications.
p. 33, ¶1	Note when the Work Plan Addendum identified in this paragraph was approved by EPA and RIDEM.
p. 32, §2.4.4	This section should also discuss the issuance of the Land Use Control Remedial Design for the site and its implications.
p. 33, §2.5.1, ¶1	The elevated concentrations of arsenic detected in the monitoring wells at the downgradient perimeter of the landfill do not support reducing groundwater monitoring to once every five years because an arsenic load continues to migrate to the bay and that needs to be monitored more diligently than once every five years.
p. 33, §2.5.1, ¶3	The last paragraph on the page relative to groundwater sampling contradicts the recommendation in the first paragraph in this section. Please correct the text to refer to sediment and porewater sampling and vent gas screening and gas sampling.
p. 34, §2.5.1	Regarding the recommendation in the second bullet, the elevated concentrations of arsenic detected in the monitoring wells at the downgradient perimeter of the landfill do not support reducing groundwater monitoring to once every five years because an arsenic load continues to migrate to the bay and that needs to be monitored more diligently than once every five years.
p. 34, §2.5.1	Regarding the discussion in the fourth bullet relative to institutional controls, please check whether the referenced documents (5090.15A and 5090.15B) are still current or if they need to be updated. Include these documents as appendices.
p. 36, §2.5.2	In the first bullet, please provide additional detail regarding the changes in toxicity values to better demonstrate that the changes result in less conservative values and support the conclusion expressed here that the protectiveness of the remedy would

	not be adversely impacted by the changes. In the third bullet, please provide additional detail regarding the changes in the risk assessment methods to better demonstrate that the changes result in less risk and support the conclusion expressed here that the protectiveness of the remedy would not be adversely impacted by the changes.
p. 37, §2.5.4, ¶1	Please correct the first full sentence as follows: "… acceptable conditions and as a result the monitoring frequency has recently been reduced."
p. 37, §2.5.4, ¶2	Please refer to the previously issued Base Instruction and the recent 2012 LUC RD. The Base Instruction restricts access and the LUC RD restricts on site activities.
p. 37, §2.5.4, ¶3	Regarding the third sentence, the CERCLA risk from shellfish exposure is independent of any State shellfishing ban based on non-CERCLA contaminants. Since the State shellfishing ban is not a component of the CERCLA remedy, remove the third and fourth sentences. If there was an increase in CERCLA contaminant levels in the sediment to the point where it exceeded CERCLA risk-based standards for shellfish consumption, EPA would consider that to be a potential remedy failure.
p. 37, §2.5.4, ¶4	Please edit the first sentence as follows: "… have been no <u>significant</u> changes in toxicity values or contaminant characteristics that would question the protectiveness of the remedy, <u>as previously discussed</u>."
pp. 38, 53, & 69	In the Next Review Section, only state when the next review will be completed. Remove the second sentence.
p. 38, §2.7	The elevated concentrations of arsenic detected in the monitoring wells at the downgradient perimeter of the landfill do not support reducing groundwater monitoring to once every five years because an arsenic load continues to migrate to the bay and that needs to be monitored more diligently than once every five years. Please update this section as appropriate based on the 2013 monitoring data. Furthermore, unless the issues described in the comments above (i.e., comments which were first presented in EPA's July 3, 2013 letter to Navy) are addressed before this FYR is complete, EPA will require follow-up actions in this section of the report prior to issuing its concurrence that the remedy is protective in the long-term. Is there still a CERCLA basis for the off-shore monitoring? Have all sediment RGs have been met? Please update this section with the 2013 monitoring data.
p. 38, §2.8	EPA will only concur that the remedy is "short-term" protective until the issues presented in the comments above are addressed.
p. 39, §3.1, ¶2	Please clarify the second sentence that refers to "including the landfill." If this is meant to refer to the NUSC Disposal Area, please change the reference accordingly.

p. 40, §3.1, ¶1	Please replace the last sentence with: "Remedial design for the groundwater and pond and stream sediment components of the remedy are underway."
p. 40 Table 3-1	Please supplement this table with the additional investigations and documents listed in Table 2-1 of the Record of Decision but missing from Table 3-1.
p. 41, §3.2, ¶4	Please clarify the third sentence by: "…flowing west from the golf course on the east."
p. 43, §3.2, ¶1	Please supplement the partial paragraph at the top of the page with the following: "RIDEM does not have an EPA-approved CSGWPP and therefore, EPA does not recognize RIDEM's classification system. EPA expects that all groundwater will be remediated to its beneficial use. However, groundwater cleanup standards do not have to be achieved under a waste management unit." Also, discuss the use of local groundwater for irrigating the golf course.
p. 43, §3.3.1	In the second bullet, remove "for human consumption."
p. 48, §3.3.2, ¶3	Please correct the ninth sentence by changing "contained" to "continued." Was the RAWP Addendum based on EPA's Superfund asbestos guidance? In particular, does only rely on visual observation of potential asbestos containing materials or will soil testing be done to confirm the presence of asbestos (this issue was previously addressed at OFFTA). Solely relying on visual observations of asbestos containing materials is not protective.
p. 48, §3.3.2, ¶4	Please indicate how the soil cover will be protected before final seeding, which will not occur for a significant time after construction of the soil cover.
p. 50, §3.5.1	Discuss the status of LUCs since the LUC RD Plan was completed in 2013.
p. 51, §3.5.2, ¶4	The relative changes for each groundwater COC presented are not consistent. Please correct.
p. 53, §3.7 Table	At the end of the Recommendations text, insert: "and incorporate measures to address the risks posed by the asbestos into the remedial action."
p. 53, §3.8	See comment for page 48, §3.3.2, ¶3 concerning whether the NUSC remedy is fully protective of potential asbestos risks.
p. 58, Table 4-1	Please add the following events to this table: • Remedial action for soil cap construction completed – May 2014 • Draft Final Long-Term Management Plan – May 2014 • ESD to revise groundwater standards – June 2014
p. 59, §4.2, ¶1	The soil cap construction has been completed as noted earlier in the report. Therefore, please update the text in this paragraph accordingly.
p. 60, §4.3	Discuss the second ESD that changed the groundwater standards.

p. 63, Table 4-2	Please revise this table to list the current performance standard for arsenic (10 µg/L) and its basis (MCL) and have the footnote provide the ROD standard and basis accordingly. For the Basis text for Manganese change "Heatlh" to "Health."
p. 64, ¶2	Update this paragraph once the LUC requirements are completed, which will occur before December 2014.
p. 64, §4.3.2	Discuss implementation of the groundwater component of the remedy.
p. 64, §4.3.3	A word is missing in the second sentence after "monitoring wells."
p. 64, §4.4.1	Is any of the fencing around the Site present before the remediation still in place and being maintained to restrict access? If so, describe the condition is it in and whether it is effective.
p. 67, §4.5.2, ¶1	Please supplement the first full sentence with: "… below those standards/objectives, unless the presence of multiple contaminants creates an unacceptable cumulative risk." If MCLs are not protective because of the presence of multiple contaminants, then according to the National Contingency Plan, risk-based standards shall be used to establish cleanup concentrations. Furthermore, with the chromium value approximately 100 times lower than the ROD value, it is not apparent that the remedial goal in the ROD is protective, unless the Navy can document that hexavalent chromium is not the predominant species present.
p. 69, §4.5.7	Adjust the groundwater performance standards based on the changes cited for toxicity values and exposure factors and issue an ESD to document the changes. The groundwater monitoring program should be adjusted to analyze baseline samples for the presence of hexavalent chromium to determine the presence of this species in site groundwater and to determine if the groundwater is potable at the well locations selected for monitoring. Depending on the monitoring results, adjustments to the monitoring locations may be made and the perimeter of the waste management area may be adjusted.
p. 69, §4.5.9	Please change Site 8 to Site 9.
p. 69, §4.7	As indicated in your e-mail dated June 11, 2014, for sites with a LUC remedy, PFCs should be considered in the FYR where historical releases may have occurred but were not previously analyzed. Since EPA has a preliminary health advisory for PFCs, EPA expects the Navy to sample for PFOA/PFOS before the next FYR. Please include a recommendation for PFOA/PFOS sampling in this section.
p. 71, Table 5-1	Please add the risk assessment revision in January 2013 and the supplemental groundwater sampling in 2014.
pp. 72 to 77	The FYR discusses in Section 5 the path forward for TFs 1-5 and those discussions do not address the metals exceedances in groundwater at these sites. This recommendation should be added to the FYR.

There has been virtually no follow-up for the metals exceedances found at TFs 4 and 5 by TRC and they exceeded the MCLs for multiple metals. For TFs 1-3, DESC's investigation was limited to petroleum so only organic parameters were part of the scope. There have been no investigations of metals concentrations in groundwater at TFs 1-3. Because product existed in the subsurface at those TFs, it is likely that metals have been mobilized at TFs 1-3. The CERCLA investigations at TFs 1-3 were focused on specific locations that RIDEM identified as potentially impacted by CERCLA contaminants, so those specific locations were moved from DESC's purview to CERCLA for further investigation. Those locations did not include general site groundwater, but that medium needs a CERCLA investigation because metals were never evaluated.

p. 73, §5.2, ¶1 — The Data Gaps Report does not address groundwater throughout Tank Farm 1. It focuses on the ethyl blending plant. Earlier groundwater investigations at Tank Farm 1 focused on organic contaminants. However, the release of petroleum to the subsurface has likely caused reducing conditions and the mobilization of significant metals concentrations, as has been observed at Tank Farms 4 and 5. Therefore, closeout of Tank Farm 1 will require follow-up groundwater sampling throughout the site to determine if groundwater requires remedial action under CERCLA because of elevated metals concentrations.

Also include another bullet for: Remedial Action Completion Report, as appropriate.

p. 74, §5.3, ¶3 — Please edit the first sentence by: "… 2013 for selected areas of the site …."

p. 75, §5.3 — Include another bullet for: Remedial Action Completion Report, as appropriate.

p. 77, §5.4 — Include another bullet for: Remedial Action Completion Report, as appropriate.

p. 77, §5.5 — As previously discussed, part of Tank Farm 4 is subject to a ROD and should be given its own section (new Section 5).

p. 78, §5.5, ¶2 — In the first sentence, please revise the text by: "… fully characterize the site soil and review areas under the IRP." No groundwater sampling targeting impacts from releases of petroleum to the subsurface were conducted during this Site Investigation or any other time since significant metals concentrations were detected in 1992 by TRC during the Phase I Remedial Investigation.

p. 78, §5.5, ¶3 — Please revise the second sentence by: "… that were impacted <u>with</u> petroleum products would …."

Please revise the last sentence by: "… areas impacted <u>with</u> petroleum will be closed …."

p. 80, §5.5, ¶1 — Please revise the first bullet to refer to "RD/RA for DU 4-1."

Delete "as appropriate" from the second bullet. Also include another bullet for: Remedial Action Completion Report.

Delete the second section of the text. Establishment of LUCs is a remedial action.

p. 80, §5.5	Please add the following final paragraph: " A Phase II Remedial Investigation of Tank Farm 4 groundwater will also be conducted to determine the current condition of groundwater in the vicinity of the former petroleum storage tanks where significant metals contamination of groundwater was detected during the Phase I Remedial Investigation in 1992."
p. 80, §5.6	As previously discussed, parts of Tank Farm 5 are subject to either an interim ROD or ROD and should be given its own section (new Section 6).
p. 82, §5.6, ¶3	Regarding the last sentence, please plan to issue a Final ROD for Tanks 53 and 56 rather than an ESD for DU 5-1. They are separate sites within Tank Farm 5 and additional investigation and remediation of Tank Farm 5 groundwater could be required.
p. 82, §5.6, ¶4	In the first sentence, please revise the text by: "… better characterize the site soil and review areas under the IRP."
p. 82, §5.6, ¶5	Please revise the second sentence by: "… that were impacted <u>with</u> petroleum products would …."
p. 83, §5.6, ¶1	Please revise the last sentence by: "… areas impacted <u>with</u> petroleum will be closed …."
p. 85, §5.6, ¶1	Please revise the second bullet to refer to "RD/RA for DU 5-1." Delete "as appropriate" from the third bullet. Also include another bullet for: Remedial Action Completion Report.
p. 85, §5.6	Please add the following final paragraph: " A Phase II Remedial Investigation of Tank Farm 5 groundwater will also be conducted to determine the current condition of groundwater in the vicinity of the former petroleum storage tanks where significant metals contamination of groundwater was detected during the Phase I Remedial Investigation in 1992."
p. 85, §5.7	A ROD for Gould Island was completed on June 30, 2014 and should be given its own section (a new Section 7).
p. 88, Table 5-7	Please add the Record of Decision to the table (the Draft Final ROD has been issued and the final will be signed before this FYR is completed).
p. 88, §5.7	Delete the first bullet and "as appropriate" from the second and third bullets. Also include another bullet for: Remedial Action Completion Report. Please correct the second paragraph to discuss the project status since a remedial action was selected.
p. 88, §5.8	As previously discussed, the two Derecktor OUs should be completed before this FYR is and should be analyzed the same as the other OUs with RODs and given their own sections (new Sections 8 and 9).
p. 90, §5.8, ¶1	Please correct the last sentence because the Final FS has already been issued.

p. 90, §5.8, ¶2	Please change the last sentence to refer to each operable unit rather than each site.
p. 91, Table 5-8	Please add the Record of Decision for each operable unit to the table because both Draft RODs have been issued and final RODs will be signed before this FYR is completed.
p. 91, §5.8	Delete the first bullet and "as appropriate" from the second and third bullets. Also include another bullet for: Remedial Action Completion Report. Please correct the second paragraph to discuss the project status for both operable units since a remedial action was selected for both.
p. 91, last ¶	Since the Derecktor ROD is likely to be completed before this FYR (*i.e.,* September vs. December), please replace this statement with "…The protectiveness of the remedial actions for Derecktor Shipyard (both On-Shore and Off-Shore) will be reviewed in subsequent FYRs."
p. 92, §5.9	Even though a Site Closeout Report has been developed, the Navy still needs to issue a final ROD for the OU.
p. 93, Table 5-9	Regarding the last line item, please add the Site Closeout Report to the on-line administrative record.
p. 93, §5.10	For consistency, please change the title of this section to Site 22 – Carr Point Storage Area (OU 10).
p. 95, §5.10, ¶1	Please insert the following sentence before the last sentence: "A discussion of MRP Site 1 is provided in Section 5.12 and a chronology table is provided in that section for events and documents specific to MRP Site 1."
p. 95, Table 5-10	Please change the title of this table to refer only to Site 22 and delete the line items specific to MRP Site 1 because they are provided in Section 5.12.
p. 96, §5.10	Please include another bullet for: Remedial Action Completion Report.
p. 98, §5.11	Please include another bullet for: Remedial Action Completion Report.
p. 100, §5.12, ¶1	Please insert the following sentence before the last sentence: "A discussion of IR Site 22 is provided in Section 5.10 and a chronology table is provided in that section for events and documents specific to IR Site 22."
p. 101, Table 5-12	Please change the title of this table to refer only to MRP Site 1.
p. 102, §5.12	Please include another bullet for: Remedial Action Completion Report.
p. 102	Please discuss any additional asbestos study areas at the end of this section.
Appendix B.1	Figure 1: Please change the Operable Unit designation for Site 4 from NA to TBD because the Step 3A refinement included in the Site Assessment and Screening Evaluation was not accepted by EPA. Please correct the acronym for Site 9/20 to OFFTA.

	For Site 19 Derecktor Shipyard, please add OU5.
Appendix B.2	Please edit the figure to distinguish between monitoring wells that are active and inactive relative to the current groundwater monitoring program.
Appendix B.3	Please include figures that depict the selected remedial action for soil and sediment as identified in the remedial designs.
Appendix D	The ARARs tables for all of the RODs that are or will be completed before December 2014 should be included in the Appendix. Note that there are ARARs cited in some of the tables that either no longer exist or have been changed, but none affect the protectiveness of the remedy. If any future decision documents are issued for OUs within the Site these ARARs may be updated.
Appendix E.1	Please update this appendix to include 2013 monitoring data.
Appendix E.2	Many of the tables in this appendix do not specify a date. Please ensure each table has a date to properly identify when the data were collected.
	Update the tables in this appendix to include all historical data.
Appendix E.3	Update this appendix to include the data collected since the last FYR.