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EMAIL AND THE RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
COMMENTS REGARDING THE DRAFT FINAL FIVE YEAR REVIEW REPORT NS NEWPORT  
RI (PUBLIC DOCUMENT)  
11/12/2014  
RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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**Subject:** RE: Draft Final Five-Year Review Report for NAVSTA Newport

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Jim/Cindy,

RIDEM reviewed the Draft Final 5-Year Review Report for Naval Station Newport. RIDEM's comments on this document are provided below.

**General Comment:**

The new text that has been added regarding the 2013 Draft Annual Monitoring Report contains a number of typographical errors. Please conduct a thorough editorial review of the additional text regarding the 2013 Draft Annual Monitoring Report for the final revision.

**RIDEM's previous comments on the Draft Report:**

Specific Comment 13 remains unaddressed. In particular, a discussion of the increase in concentrations in biota, particularly PCBs, was not added to Section 2.4.2.3. This section discusses the results of sediment, porewater, and biota conducted as part of the 2013 Draft Annual Monitoring Report for McAllister Point Landfill but omits discussion regarding increasing concentrations in biota. Please summarize the biota results and identify which constituents exceed project action limits (PALs) in the dredged and non-dredged near-shore and off-shore areas (i.e., MSG-1 through MSG-4).

**Specific comments on the Draft Final:**

1. **p. 29, Section 2.4.2.1, Groundwater.**

As stated in the 4th paragraph, porewater metals sampling performed in 2009 showed no detections of arsenic in porewater closest to the landfill (Group 1 locations). However, porewater metals sampling performed in 2013 showed arsenic concentrations ranging from non-detect to 88 µg/L in porewater closest to the landfill (Group 1 locations). The Navy states that although arsenic levels in porewater appear to have increased, so did arsenic levels in porewater within the reference area. However, the Navy does not discuss whether the increase in the reference area was consistent with the increase at the offshore location. The Navy concludes that the site does not appear to be creating elevated off-shore arsenic porewater levels. This conclusion seems premature when the data seem to indicate the opposite is occurring. Please provide supplemental information to support this statement. Additionally, please revise the last sentence of the 4th paragraph to indicate the uncertainty with determining a trend based on two rounds of data (i.e., basing a conclusion on the 2009 and 2013 results).

2. **Appendix E.1, Figure 2-3.**

Please shade in red all arsenic concentrations greater than the MCL of 10 µg/L collected in 2013.

Please contact me if you have any questions.

Thanks.

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**Subject:** Draft Final Five-Year Review Report for NAVSTA Newport

To all:

The Draft Final Five-Year Review Report for NAVSTA Newport has been completed and you should have just received a separate e-mail with a link to download the report. The cover letter is attached here and also included via the link. Hard copies and CDs are being mailed today. Please let me know if there are any problems downloading the report.

Cindy

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