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LETTER AND THE U S EPA REGION 1 CONCURRENCE OF THE DRAFT FINAL REMEDIAL  
INVESTIGATION WORK PLAN TIER II SAMPLING AND ANALYSIS PLAN CODDINGTON  
POINT BURIED DEBRIS AREAS NS NEWPORT RI  
12/06/2013  
U S EPA REGION I BOSTON MA



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
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December 6, 2013

Dominic O'Connor  
Remedial Project Manager (Code OPTE3)  
Naval Facilities Engineering Command, Mid-Atlantic  
Building Z-144  
9742 Maryland Avenue  
Norfolk, VA 23511-3095

Re: Draft Final RI Work Plan/Tier II Sampling and Analysis Plan  
Coddington Point Buried Debris Areas  
NAVSTA Newport, RI  
November 2013  
**EPA Concurrence**

Dear Mr. O'Connor:

EPA has completed its review of the "Draft Final RI Work Plan/Tier II Sampling and Analysis Plan, Coddington Point Buried Debris Areas, NAVSTA Newport, RI," dated November 2013, as prepared by Resolution Consultants, on behalf of Naval Station Newport, RI (hereafter referred to as the Draft Final RI WP). The Draft Final RI WP was reviewed to ensure that it reflected the resolution of EPA comments on the Draft and revised Draft SAP and consensus path forward decisions reached during the July 10, 2013 meeting, the August 1, 2013 conference call and related exchanges to resolve comments and concerns. EPA hereby concurs with the November 2013 Draft Final RI WP.

EPA does, however, offer the following qualifications:

- The Executive Summary of the Draft Final RI WP states that "the report, Draft – Evaluation of Urban Fill, Coddington Point, Naval Station Newport; Newport Rhode Island (TetraTech, 2012) serves as the Study Area Screening Evaluation (SASE) for these five AOCs." EPA does not agree that the referenced document meets the requirements of an SASE, under the FFA, but concurs with the proposed path forward of completing an RI.
- Worksheet 11, page WS 11-3, states that "(e)quivalent covers include barriers such as 3 or more inches of concrete, a building or other structure that cannot be accidentally unearthed." While EPA agrees that concrete slabs 3 inches in thickness or greater, buildings, and other structures function as barriers that cannot be accidentally unearthed, EPA needs to have further internal discussions to confirm that the proposal included in this RI WP meets the intent of the 40 CFR 61.151 regulations. However,

Navy should proceed with the implementation of the RI effort as we expect to have this issue resolved prior to the conclusion of the RI field program.

In addition, EPA wishes to reiterate that 'closure' on 2 other Study Areas is still necessary. Note that EPA's October 26, 2011 letter and Navy's March 20, 2011 letter designated 7 areas where asbestos releases had occurred as Study Areas under the FFA. The 7 Study Areas included the 5 Study Areas located on Coddington Point, which are addressed under the Draft Final RI WP, and 2 others: the New Chiller Unit – Bldg. #1284 CHI and New Fitness Center near Bldg. #109 CP. Written documentation regarding the status of the New Chiller Unit – Bldg. #1284 CHI and New Fitness Center near Bldg. #109 CP must be provided to EPA in order for EPA to consider and concur with Navy's position that these additional Study Areas do not pose a threat or potential threat to human health or the environment and can be removed from further study under the FFA, consistent with Paragraph 31.7 of the FFA.

Finally, in light of the findings at Coddington Point and the conceptual site model for historical demolition practices at the base, EPA reiterates the request in our October 26, 2011 letter that Navy provide EPA with a list of other sites potentially containing asbestos that may be a threat, or potential threat, to human health or the environment, consistent with the FFA. As discussed at the November 20, 2013 RPM meeting, Navy should consult with its NAVSTA Newport staff on this request as they may have some historical information to both help with the documentation for the 2 other areas included as Study Areas and any additional areas that may warrant further evaluation under the FFA.

If you have any questions, please contact Bill Lovely at (617) 918-1240 or at [lovely.william@epa.gov](mailto:lovely.william@epa.gov).

Sincerely,



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Remedial Project Manager

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