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EMAIL REGARDING RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
RESPONSE TO U S NAVY RESPONSE TO COMMENTS ON THE DRAFT FEASIBILITY
STUDY FOR SITE 7 TANK FARM 1 NS NEWPORT RI
2/26/2015
RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

From: [Crump, Pamela \(DEM\)](#)
To: [Castleberry, Cindy](#); james.gravette@navy.mil
Cc: Kauffman, Mark; lmcintosh@woodardcurran.com; Dolan.Jane@epa.gov; deborah.j.moore@navy.mil; kemp@mabbett.com
Subject: RE: RTCs on Draft Feasibility Study Report, Site 7 - Tank Farm 1, OU 13, NAVSTA Newport
Date: Thursday, February 26, 2015 2:36:13 PM

Hi Jim/Cindy,

Please see below for RIDEM's response to the Navy's RTCs on the Draft Feasibility Study for Site 7 – Tank Farm 1 submitted on December 23, 2014. Please feel free to contact me if you have any questions or wish to discuss these. Thanks!

RIDEM's follow-up comments on the Navy's Responses to Comments on the Draft Feasibility Study for Tank Farm 1

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General Comment 1: Please revise the 6th sentence to “*No unacceptable risk to groundwater at the EBP was identified during the DGA.*” Please consider revising the title of this document to “*Draft Feasibility Study for the Ethyl Blending Plant and Transformer Vaults TV2 and TV3 at Tank Farm 1.*”

General Comment 2: Please indicate clearly in the report the reason that PRGs were not selected for subsurface soil (there was no calculated risk from subsurface soil and no exceedances of applicable criteria).

Specific Comment 5: Please indicate that maximum subsurface soil concentrations were not compared to risk-based criteria because there was no risk found from subsurface soil.

Specific Comment 7: See previous comment (specific comment #5).

Specific Comment 28: Please strike the sentence “*Therefore, these metals are not considered to be attributable to site conditions.*” Widespread, low-level contamination suggests that there may not be a specific point source, but it doesn't indicate that the contamination isn't definitively related to the site.

Specific Comment 57: In the 5th bullet, the response references Tank Farm 4; however, the Tank Farm 5 remedy utilizes two feet of cover soil while the remedy at Tank Farm 4 includes excavation and backfill. The Tank Farm 5 ROD contains the following Action-Specific ARARs which should also be included in this FS: Clean Air Act – Fugitive Dust Control, Soil Erosion and Sediment Control Handbook, Rhode Island Solid Waste Regulations [Dust Control, Sedimentation and Erosion Control, Vegetated Top Cover, Cover Permeability, and Surface Water Drainage]. Note that several of these sections only apply to Soil Alternatives 4 and 5. Please include these ARARs in this ROD and any other applicable rules and regulations consistent with other sites at Naval Station Newport.

Specific Comment 61: Please rework the proposed text grammar, since the 2nd sentence (“Not appropriate...”) is incomplete.

Table ES-1, Summary of Comparative Analysis: Please check for consistency between the costs provided in this table and Tables 4-2 through 4-4, Table 5-1, and Appendix A. There are multiple instances where values do not match among these tables.

Pamela E. Crump, EIT
Sanitary Engineer
State of Rhode Island
Department of Environmental Management
Office of Waste Management
235 Promenade Street
Providence, RI 02908-5767
401-222-2797 x 7020
pamela.crump@dem.ri.gov

From: Castleberry, Cindy [mailto:Cindy.Castleberry@aecom.com]
Sent: Tuesday, December 23, 2014 3:27 PM
To: Crump, Pamela (DEM); lmcintosh@woodardcurran.com; Jane Dolan (Dolan.Jane@epa.gov); kemp@mabbett.com; 'Moore, Deborah J CIV NAVFAC MIDLANT, PWD Newport' (deborah.j.moore@navy.mil); james.gravette@navy.mil; Kauffman, Mark
Subject: RTCs on Draft Feasibility Study Report, Site 7 - Tank Farm 1, OU 13, NAVSTA Newport

To all:

The Responses to Comments (RTCs) on the Draft Feasibility Study for Site 7 – Tank Farm 1 (OU13) have been completed and you should have just received a separate e-mail with a link to download the package. The cover letter is attached here and also included via the link. Hard copies and CDs are also in the mail. Please let me know if there are any problems downloading the RTC package.

Cindy

Cindy Castleberry, PE
NAVFAC Atlantic CLEAN, CTO Manager
T 781.224.6350 F 781.224.6542
cindy.castleberry@aecom.com
Resolution Consultants
A Joint Venture of AECOM & EnSafe
701 Edgewater Drive
Wakefield, MA 01880
T 781.246.5200 F 781.245.6293