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TRANSMITTAL LETTER FOR THE DRAFT FINAL FEASIBILITY STUDY REPORT FOR
DECISION UNIT 1-1 ETHYL BLENDING PLANT AND TRANSFORMER VAULTS SITE 7 TANK
FARM 1 OPERABLE UNIT 13 (OU 13) NS NEWPORT RI
3/4/2015
RESOLUTION CONSULTANTS

March 4, 2015

U.S. Environmental Protection Agency, Region 1
Federal Facilities Superfund Section
Attn: Ms. Jane Dolan
5 Post Office Square, Suite 100
Mail Code: OSRR07-3
Boston, MA 02109-3912

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

**RE: Draft Final Feasibility Study (FS) Report
Decision Unit 1-1 – Ethyl Blending Plant and Transformer Vaults
Site 7 – Tank Farm 1, OU 13
Naval Station (NAVSTA) Newport, Rhode Island**

Dear Ms. Dolan and Ms. Crump:

On behalf of the Naval Facilities Engineering Command (NAVFAC), Mid-Atlantic (MIDLANT), Resolution Consultants is pleased to provide this Draft Final Feasibility Study (FS) Report for the Ethyl Blending Plant (EBP) and Transformer Vaults (TVs) at Tank Farm 1. For clarification, the Navy is referring to this portion of Tank Farm 1 as "Decision Unit (DU) 1-1", which is consistent with the nomenclature used for the other tank farms. This report is being provided for the agencies final review and concurrence. In order to maintain the FFA schedule, agency concurrence is expected on or before April 2, 2015.

This draft final version reflects revisions indicated in the Navy's Responses to Comments (RTCs) on the draft FS and also incorporates EPA's additional comments received in writing on January 14, 2015, RIDEM's additional comments received via e-mail on February 26, 2015, discussions with the agencies on February 11, 2015, and informal follow-up e-mail correspondence with EPA. Specific items of note are listed below for the agencies' consideration and additional discussion as-needed for the team to finalize the FS report.

Items of Note:

1. EPA's comment GC-1 on the Navy's RTCs states in part that "...virgin petroleum releases that cause the mobilization of metals in groundwater that result in excess risk from groundwater use due to metals concentrations fall under the purview of CERCLA and should be addressed." The comment also states that "...this FS should only address Tank Farm 1 soil" and that "a separate groundwater FS should be prepared following an appropriate CERCLA investigation of Tank Farm 1 groundwater." Note

also that several other comments (SP-1, SP-14, SP-15, SP-25, SP-26, and SP-76) all reference comment GC-1.

CERCLA §101(14) excludes petroleum from the definition of a hazardous substance. The Navy does not agree that the release of such a non-hazardous substance falls under the purview of CERCLA. The Navy has initiated discussions with EPA to work towards resolving this issue for Tank Farm 1 and potentially the other tank farms at NAVSTA Newport.

In the meantime, the FS Report has been modified to address "Decision Unit (DU) 1-1 at Site 7 – Tank Farm 1" and the following language has been included to define DU 1-1: "DU 1-1 is defined as two exposure areas within Tank Farm 1 where CERCLA releases have occurred. The two specific exposure areas consist of the Ethyl Blending Plant (EBP) (includes the EBP and associated previously designated Area of Concerns [AOCs] TF1-004, TF1-005 and TF1-018) and the Transformer Vaults (includes Transformer Vault 2 [TV2] and Transformer Vault 3 [TV3])." The Navy has made this modification so that this FS Report can be finalized and the CERCLA process can proceed, while not precluding establishment of an additional DU, if determined to be necessary, in the future.

2. As agreed to with EPA on February 11, 2015, no change has been made to the FS Report based on EPA's comment SP-2; however, as discussed, the Navy plans to provide the information requested regarding DLA Energy operations at Tank Farm 1, outside the context of the FS Report.
3. As agreed to with EPA on February 11, 2015 and in a follow-up e-mail exchange, no change has been made to the FS Report in response to EPA comments SP-19 (2nd paragraph), SP-20, SP-30, SP-50 and SP-52 (except PCB-related portions), SP-54, SP-62, SP-64 – 66, SP-95, and SP-100.
4. The Navy has modified the titles of the remedial alternatives to be more descriptive. The former and new titles are as follows:

Old Titles	New Titles
S-1: No Action	S-1: No Action
S-2: Limited Action	S-2: Limited Soil Excavation with Land Use Controls
S-3: Excavation and Off-Site Disposal	S-3: Soil Excavation (with Short-Term Land Use Controls under EBP Building Only)
S-4: Containment	S-4: Limited Soil Excavation with Soil Cover and Land Use Controls
S-5: On-site Consolidation and Containment	S-5: On-Site Consolidation and Soil Cover with Land Use Controls

Please address your input to Cindy Castleberry, CTO Manager (781-224-6350), Mark Kauffman, Activity Coordinator (978-905-2262), and/or Jim Gravette, Navy RPM (757-341-2014). We look forward to working with you to finalize this document.

Sincerely,

A handwritten signature in blue ink that reads "Cindy Castleberry".

Cindy Castleberry, PE
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