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EMAIL REGARDING RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
COMMENTS ON THE REVISED DRAFT FINAL FEASIBILITY STUDY FOR DECISION UNIT 1-
1, DECISION UNIT 1-2, AND DECISION UNIT 1-3 AT TANK FARM 1 SITE 7 NS NEWPORT RI

9/29/2015

RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

Castleberry, Cindy

From: Crump, Pamela (DEM) <pamela.crump@dem.ri.gov>
Sent: Tuesday, September 29, 2015 3:26 PM
To: james.gravette@navy.mil
Cc: Kauffman, Mark; Castleberry, Cindy; Dolan.Jane@epa.gov;
Imcintosh@woodardcurran.com; deborah.j.moore@navy.mil
Subject: RE: Revised Draft Final Feasibility Study for DUs 1-1, 1-2, and 1-3 at Site 7 - Tank Farm 1, OU 13, NAVSTA Newport

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Jim,

RIDEM reviewed the *Revised Draft Final Feasibility Study, Decision Units 1-1, 1-2, & 1-3 at Tank Farm 1 – Site 7* dated August 14, 2015. Based on our review, RIDEM has several minor comments on this document as shown below.

RIDEM's comments on the Revised Draft Final FS:

Table of Contents, Tables, Page ii. Please ensure that the titles listed for Tables 2-3 and 2-8 match the titles listed on the actual tables.

Table of Contents, Figures, Page iii. Please change the typographical error "Pahs" to "PAHs" in the title of Figure 6.

Table ES-1, Summary of Remedial Alternative Components, 2nd to last row. Please remove the reference to additional delineation sampling at DU 1-2 (since additional sampling at this location is not proposed in the Draft SAP for the Soil PDI).

p. 28, Section 2.4, Estimation of Areas and Volumes, DU 1-1, last paragraph, last sentence. Please change the sentence to read, "As such, impacted subsurface soil was not identified at DU 1-1 that requires remedial response actions."

Table B-4a, Chemical-Specific ARARs and TBCs. In the title block, please change, "Alternative S-4: Soil Excavation with Soil Cover...." to "Alternative S-4: Limited Soil Excavation with Soil Cover..."

Figure 10 – Surface Soils Exceeding PRGs, Decision Unit 1-3. Please: 1) note typographical error of "PRG Exceedance"; 2) remove "-D" from the sample ID TF1-TV3-SB1027. In addition, RIDEM notes that sample SB1032-D presents the maximum concentration between the primary and field duplicate samples, rather than an average concentration. Although this approach is conservative and preferred by RIDEM, it is inconsistent with the approach taken with respect to other contaminants (i.e., PAHs at SB1011 as shown on Figure 8, which considers the average concentration when comparing to PRGs.) Please be consistent when using data from duplicate samples.

Appendix C, Cost Estimates. Please update the text of the "Site" and "Description" to match the Revised Draft Final references to the three decision units.

Please contact me if you have any questions regarding these comments.

Thanks.



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Sent: Friday, August 14, 2015 1:24 PM

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Cc: Kauffman, Mark <mark.kauffman@aecom.com>

Subject: Revised Draft Final Feasibility Study for DUs 1-1, 1-2, and 1-3 at Site 7 - Tank Farm 1, OU 13, NAVSTA Newport

To all:

On behalf of Jim Gravette, I am providing the Revised Draft Final Feasibility Study Report for Decision Units 1-1, 1-2, and 1-3 at Site 7 – Tank Farm 1, OU13, NAVSTA Newport. You should receive a separate e-mail shortly with a link to download the report. 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 report. As noted in the cover letter, to maintain the FFA schedule expectations and the EMEC target for a signed ROD, agency concurrence is expected within 30 days, which is on or before September 13, 2015.

Cindy

Cindy Castleberry, PE

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