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U S NAVY RESPONSES TO U S EPA REGION I AND RHODE ISLAND DEPARTMENT OF  
ENVIRONMENTAL MANAGEMENT COMMENTS ON DRAFT RECORD OF DECISION SITE 7  
TANK FARM 1 DECISION UNITS 1-1, 1-2 ( DU 1-1, DU 1-2) AND OPERABLE UNIT 13 ( OU  
13) NS NEWPORT RI  
05/13/2016  
RESOLUTION CONSULTANTS

Navy Responses to Regulatory Agency Comments  
EPA Comments, April 15, 2016  
RIDEM Comments, April 28, 2016

Draft Record of Decision,  
Site 7 – Tank Farm 1, Decision Units 1-1, 1-2, and 1-3 (Operable Unit 13)  
Naval Station Newport, Portsmouth, Rhode Island

May 13, 2016

EPA Specific Comments:

*EPA Specific Comment 1: p. 8, §1.2 – Insert the legal citations for CERCLA – “42 U.S.C. §9601 et seq.” and the NCP citation of “40 C.F.R. Part 300.”*

Response: The citations will be added as requested.

*EPA Specific Comment 2: p. 8, §1.3 – The first paragraph should discuss that there is inaccessible soil under structures that will be assessed if the buildings are demolished and that, because no assessment of contamination inside the structures was conducted, any demolition would be conducted so as not to pose a risk to human health or the environment.*

*Remove the second paragraph on page 8 and the first paragraph on page 9 (text was not included in the Proposed Plan). Groundwater is being assessed separately.*

Response: The second paragraph in Section 1.3 will be removed, and the following sentence will be added to the end of the first paragraph: “There is inaccessible soil under structures at each of the three Decision Units that will be assessed if the buildings are demolished. No assessment of contamination inside these structures was conducted; therefore any demolition would be conducted so as not to pose a risk to human health or the environment.”

*EPA Specific Comment 3: p. 9, 1st bull – Is the “April 2012 dispute resolution agreement” cited in the administrative record?*

Response: This document does not appear to have been placed in the Administrative Record. We will have the document added prior to finalizing the ROD. The document will also be added to the Detailed Administrative Record Table located prior to the Appendices in the ROD.

*EPA Specific Comment 4: p. 9, §1.4 – Should the RAOs be described in the section or in a section to be inserted before this section?*

*In the first and second bullets also note that the cleanup standards will permit limited recreational use.*

*In the sixth bullet spell out the “Toxic Substances Control Act (TSCA)” and add the citation “, 15 U.S.C. §§ 2601 et seq.,”*

Response: Inclusion of RAOs in Section 1.4 or elsewhere in the Declaration is not consistent with EPA ROD guidance, the Model Region 1 ROD from EPA, or other RODs that have been issued for NAVSTA Newport. For consistency, RAOs will not be added to the Declaration.

The words "and allow for industrial and restricted recreational use" will be added to the end of the first sentence of each of the first and second bullets. The sixth bullet will be edited as requested.

*EPA Specific Comment 5: p. 10, §1.4 – Insert a new fourth sentence: "If and when TV2 and/or TV3 are demolished in the future, the demolition will meet TSCA protectiveness standards so as not to create a threat of release to the environment."*

Response: Based on RIDEM Specific Comment 5, the referenced paragraph will be re-written to avoid redundancy with the bulleted descriptions of the remedy components above. Since the requested language is already included in the bullets, it does not seem appropriate to include the same language in this paragraph. See RIDEM Specific Comment 5 for the revised paragraph.

*EPA Specific Comment 6: p. 10, §1.5 – The first sentence is too lengthy. Please consider revising. Also in the fourth paragraph use the same text as the TSCA Determination used on EPA's signature page: "Human health and ecological risk assessments were conducted using CERCLA risk assessment methods and guidance. Accordingly, and based on the provisions of 40 CFR § 761.61 (c), EPA has determined that the risk-based RGs for PCBs in soil at DU 1-2 and DU 1-3 will meet the no unreasonable risk standard in accordance with § 761.61 (c) through the removal and off-site disposal of all PCB-contaminated soil exceeding the Ecological and Industrial RGs; the implementation of LUCs at DU 1-2 and DU 1-3 to restrict residential and other unrestricted use of remaining areas with PCB-contaminated soil above the Residential RG and prevent exposure to soil beneath existing transformer vault foundations through maintenance of the transformer vault foundations, since that soil has not been assessed; and if the transformer vaults are demolished in the future, the assessment of the underlying soils and remediation, if needed, to meet the Ecological and Industrial RGs. If and when TV2 and/or TV3 are demolished in the future, the demolition will meet TSCA protectiveness standards so as not to create a threat of release to the environment."*

Response: The first sentence in section 1.5 will be reworked into two shorter, easier to read sentences, and the fourth paragraph in Section 1.5 will be replaced with the above stated text.

*EPA Specific Comment 7: p. 12, §1.7.2 – Add at the end of the TSCA determination text: "If and when TV2 and/or TV3 are demolished in the future, the demolition will meet TSCA protectiveness standards so as not to create a threat of release to the environment."*

Response: The text will be added as requested.

*EPA Specific Comment 8: p. 13, §1.7.2 – Please remove James T. Owens from the signature block and identify Bryan Olson as the Director, Office of Site Remediation and Restoration.*

Response: The change will be made as requested.

*EPA Specific Comment 9: p. 16, §2.2 – Remove “cited violations under federal or state environmental law or any.” There have been releases of contaminants in violation of CERCLA and of petroleum in violation of State standards.*

Response: The referenced text will be deleted.

*EPA Specific Comment 10: p. 17, §2.3 – Add at the end of the fourth sentence of the first paragraph “and in information repositories in the Middletown, Portsmouth, and Newport public libraries.” The second paragraph should be written in the past tense since all the events described will have happened at the time the ROD is issued.*

Response: The requested text will be added to the end of the fourth sentence of the first paragraph. The second paragraph will be revised as follows (the placeholders for numbers of comments will be updated following the public comment period and prior to submittal of the next report version): “In accordance with Sections 113 and 117 of CERCLA, the Navy provided a public comment period from May 5, 2016 to June 4, 2016, for the proposed remedial action described in the Proposed Plan for OU13 at Site 7. A public meeting to present the Proposed Plan was held on May 18, 2016, at the Courtyard Marriott, 9 Commerce Drive, Middletown, Rhode Island. A public notice of the meeting and availability of documents was published in the Newport Daily News on May 2, 2016. Immediately following the public informational meeting, the Navy held a public hearing to solicit public comments for the record. A transcript of the oral comments received during the public hearing is provided in Appendix E. XXX comments were received during the public hearing, and XXX written comments were received during the 30-day comment period. The Navy’s Responsiveness Summary is presented in Section 3.0 of this ROD.”

*EPA Specific Comment 11: p. 18, §2.4 – In the third paragraph include more information describing the State-lead cleanup (such as was used in the Proposed Plan).*

Response: The following text will be added after the third paragraph:

“The Defense Logistics Agency (DLA) is conducting closure activities for these tanks in accordance with RIDEM UST regulations. DLA’s closure activities are currently anticipated to include soil remediation in the vicinity of certain tanks, followed by permanent closure of the USTs that are no longer being used in accordance with RIDEM UST and remediation regulations. Permanent closure would include demolition of the USTs, removal of fuel distribution piping and associated structures (assumed to include the EBP, TV2, and TV3), backfill, and seeding.”

*EPA Specific Comment 12: p. 19, §2.5 – In the last sentence insert “or 500-year” after “100-year.”*

Response: The additional text will be added as requested.

*EPA Specific Comment 13: p. 19, §2.6 – In the last paragraph also note that the Navy plans to transfer ownership of the Tank Farm.*

Response: The paragraph will be revised as follows: “Current site usage is industrial/commercial with some limited recreational use (hunters). Other current or reasonably foreseeable future receptors include construction workers and trespassers. The Tank Farm 1 site

has been identified as excess property by the Navy and is currently undergoing the DoD Base Realignment and Closure (BRAC) process. Future use plans for Tank Farm 1, including DUs 1-1, 1-2, and 1-3, have not been finalized (Tetra Tech, 2014); however, there is no current or planned residential or unrestricted recreational use of the site. Although there is no current or planned residential or unrestricted recreational use of the site; these uses were also evaluated to provide a basis for the need for a cleanup action. Terrestrial biota were evaluated as ecological receptors."

*EPA Specific Comment 14: p. 20, §2.7 – This section should be updated based upon the results of the PDI sampling. Farm.*

Response: The PDI field investigation is ongoing and the timing for completion may not allow for inclusion in this ROD. If that is the case, the PDI results will be incorporated in the Remedial Design.

*EPA Specific Comment 15: p. 23, §2.8 – "Comprehensive" is misspelled in the fifth paragraph. Please revise.*

Response: The typo will be corrected.

*EPA Specific Comment 16: p. 22, §2.7.2 – Regarding the first sentence of the fourth paragraph, PCBs in DU 1-2 did exceed RI PCB soil leachability standards of 10 mg/kg.*

Response: The paragraph has been revised as follows: "PCBs have a low solubility in water and have a tendency to sorb strongly to soil. As such, PCB concentrations are expected to sorb to surface soil, remain relatively immobile, and not leach to other media. This is consistent with the lack of detection of PCBs in subsurface soil. However, the highest PCB concentrations at DU 1-2 did exceed RIDEM leachability criteria. PCBs have the potential to biodegrade; however, the degradation rate is very low."

*EPA Specific Comment 17: p. 23, §2.8 – Change color and font of text in blue to the standard text font (and anywhere else blue text appears in the draft document).*

Response: For consistency with all of the other RODs for NAVSTA Newport sites that have been issued over the past several years, it is preferred to retain the highlighting of key phrases/terms in the ROD with blue font. These highlighted phrases correspond to the Detailed Administrative Record Table that is located before the appendices in the ROD. No change will be made based on this comment.

*EPA Specific Comment 18: p. 29, §2.9.6 – Regarding the third and fourth sentences of the second paragraph, clarify that PCB levels did exceed EPA risk-based standards for unrestricted use.*

Response: The referenced text describes the results of the human health risk screening evaluation and is accurate. Section 2.9.8 Basis for Action includes the language that is requested here. No change will be made based on this comment.

*EPA Specific Comment 19: p. 29, §2.9.7 – In the last sentence of the second paragraph change "thereceptor" to "the receptor."*

Response: The typo has been corrected.

*EPA Specific Comment 20: p. 30, §2.9.8 – Should this section also discuss exceedances of State leachability standards in DU 1-1 (for VOCs) and DU 1-2 (for PCBs).*

Response: This section presents the results of the risk assessment that form the basis for action. ARARs, such as the State leachability standards, are only applicable to those media that are associated with unacceptable risks and are addressed in the next section (2.10) during RAO development. No change has been made.

*EPA Specific Comment 21: p. 31, §2.10 – In the last sentence of the first paragraph as to why PCBs are a COC, they also exceed human health risk based standards for unrestricted use and RI leachability standards in DU 1-2.*

*In the fifth paragraph change “cleanup levels” to “Remediation Goals (RGs)” and replace the term throughout the rest of the document. The remedy is not cleaning up soil down to unlimited use but is instead relying on LUCs.*

Response: Regarding the first part of the comment, exceedances of ARARs are addressed in third and fourth paragraphs on page 31. A global change will be made to change “cleanup levels” to “Remedial Goals” or “RGs” and Remedial Goals will be defined with the first usage.

*EPA Specific Comment 22: p. 34, Table 2-7 – For the cost summaries use the revised values cited in the “Modification of Alternative S-2 as the Preferred Remedy” memo dated April 5, 2016. Make this change anywhere else in the document where cost estimates are cited (including in Table 2-8, Section 2.12.2.5, Appendix B)*

*In the text describing LUC requirements for S-2, S-3 and S-4 describe how LUCs would be maintained when the Navy transfers the property.*

Response: In order to introduce the change to Alternative S-2, the following text will be added to the end of the paragraph immediately prior to Table 2-7: “Note that subsequent to completion of the FS (Resolution, 2015), the Navy made a modification to Alternative S-2, which was documented in a Memorandum to Site File (Resolution, 2016). The modification has been incorporated in the alternative description and associated costs in Table 2-7.”

The details of Alternative S-2 in Table 2-7 will be modified to match the revisions made in the Memorandum to Site File and the costs will be updated to match the costs presented in the Memorandum to Site File.

The costs presented in Table 2-8 and in Section 2.12.2.5 will be updated to match the costs presented in the Memorandum to Site File. A reference to the Memorandum to Site File will be added to the first sentence of Section 2.14.1.

Note that the cost estimate provided in Appendix B of the Draft ROD is the same as what was presented in the Memorandum to Site File, so no further change is needed.

The Memorandum to Site File will also be added to the Detailed Administrative Record Table that is located before the appendices in the ROD.

The following text will be added to the LUCs and Inspections details for S-2, S-3, and S-4: "As long as Navy retains ownership of the property, NAVSTA Newport enforces the LUCs and assures that each LUC is maintained appropriately by tracking it through a centralized tracking system. If the property is transferred from the Navy to another federal owner, upon meeting the requirements for transfers under the site's FFA, Navy would ensure as part of the transfer process that the gaining agency is made aware of the existing controls and would take appropriate action to ensure that such controls remain in place. If the property is ever transferred to non-federal ownership, deed restrictions, meeting state property law standards, would be recorded that would incorporate and land use restrictions. Although the Navy may transfer the procedural LUC responsibilities to another party by contract, property transfer agreement, or through other means, the Navy shall retain ultimate responsibility for remedy integrity. LUCs will be maintained until the concentrations of hazardous substances in the soil are at levels that allow for unrestricted use and exposure."

*EPA Specific Comment 23: p. 38, §2.12.1.1 – In the text also describe how under S-3 temporary LUCs and 5-Year Reviews for as long as LUCs are in place will maintain the protectiveness of the remedy in the area under the structures until such time that they are removed and the soil underneath assessed.*

*In the last sentence add that S-1 also would not be protective of the environment.*

Response: The following text will be inserted following the third sentence of the paragraph: "In the interim, short-term LUCs and five-year reviews, under Alternative S-3, will maintain the protectiveness of the remedy in the area under the structures, until such time that they are removed and the soil underneath assessed."

In the last sentence, the words "and the environment" were added after "...human health..."

*EPA Specific Comment 24: p. 39, Table 2-8 – For the final draft text needs to be inserted regarding compliance with the two Modifying Criteria.*

Response: Agreed. Text will be inserted following the public comment period.

*EPA Specific Comment 25: p. 38, §2.12.2.1 – Regarding the third sentence, under S-2 and S-4 contaminated soil will be left behind in all three DUs.*

Response: Since page 38 is referenced, it is assumed that this comment refers to Section 2.12.1.1. The third sentence in that section was meant to refer to Alternative S-3 only. For further clarification, the words "Under Alternative S-3," will be added to the beginning of that sentence.

*EPA Specific Comment 26: p. 44, §2.14.2 – In the first sentence of the first paragraph remove "with modification."*

*In the first sentence of the second paragraph soil exceeding RI leachability standards will also be removed. EPA assumes this description and visuals will be updated as a result of the PDI sampling. Please clarify.*

Response: The words "with modification" will be removed in the first paragraph. In the second paragraph, first sentence, the words "(including RIDEM GA Leachability Criteria)" will be added following the second instance of "...Industrial RGs..."

Regarding the last part of the comment, the PDI field investigation is ongoing and the timing for completion may not allow for inclusion in this ROD. If that is the case, the PDI results will be incorporated in the Remedial Design.

*EPA Specific Comment 27: p. 46, §2.15 – In the last sentence of the second paragraph insert "and compliance monitoring" after "LUCs."*

Response: The last sentence in the second paragraph in section 2.15 will be modified to read "LUCs and compliance monitoring will ensure the long-term effectiveness of the remedy."

*EPA Specific Comment 28: p. 47, §2.15 – In the first paragraph add a sentence referencing the TSCA Determination incorporated into EPA's signature page.*

Response: The following sentence will be added to the end of the first paragraph: "Incorporated into this ROD is an EPA finding that the remedy selected will address PCB-contaminated media in order to control risk of injury to human health or the environment, in compliance with 40 CFR Section 761.61(c)."

*EPA Specific Comment 29: Fig 4 & 5 – Show the boundary of the LUC areas.*

Response: The figures have been updated to show the LUC area boundaries and are attached.

*EPA Specific Comment 30: App. D Tables – Why is "(Modified)" in the ARARs table titles?*

Response: The "(Modified)" text will be deleted.

*EPA Specific Comment 31: App. D, Chem Table – In the Action to be Taken text for the federal PCB guidance add: "LUCs will ensure that accessible soil exceeding human health and ecological risk levels will be removed and the inaccessible soil under structures be assessed if the structures are removed. Future demolition of the TV structures will be conducted so as not to cause any release of PCBs."*

*Other than the PCB guidance is and any other federal guidance used to develop the eco-risk PRG?*

*In the Action to be Taken text for the RI Remediation Regulations change "PRGs" to "RGs" and in the last sentence note that all soil exceeding GA leachability standards will also be excavated.*

Response: The requested text will be added to the federal PCB guidance text.

The following items will be added relative to development of the eco-risk RG:

Ecological Risk Assessment Guidance for	EPA/540/R-97/006	To Be Considered	EPA guidance for conducting ecological risk assessments	Used to calculate potential wildlife risks and PRGs. The action to be taken
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Superfund: Process for Designing and Conducting Ecological Risk Assessments				under this alternative will mitigate risk to receptors through excavation of soil that exceeds the ecological PRG at DU 1-2 and 1-3.
Final Guidelines for Ecological Risk Assessment	EPA/630/R095/002F	To Be Considered	EPA guidance for conducting ecological risk assessments	Used to calculate potential wildlife risks and PRGs. The action to be taken under this alternative will mitigate risk to receptors through excavation of soil that exceeds the ecological PRG at DU 1-2 and 1-3.
Guidance for Developing Ecological Soil Screening Levels	OSWER Directive 9285.7-55	To Be Considered	EPA guidance for generating ecological soil screening levels	Used to calculate potential wildlife risks and PRGs. The action to be taken under this alternative will mitigate risk to receptors through excavation of soil that exceeds the ecological PRG at DU 1-2 and 1-3.
Toxicological Benchmarks for Wildlife: 1996 Revision	ES/ER/TM-86/R3	To Be Considered	Oak Ridge National Laboratory guidance on toxicity values for wildlife	Used to calculate potential wildlife risks and PRGs. The action to be taken under this alternative will mitigate risk to receptors through excavation of soil that exceeds the ecological PRG at DU 1-2 and 1-3.
Wildlife Exposure Factors Handbook. Vols. I and II	EPA/600-R/R- 93/187a	To Be Considered	EPA guidance on identifying exposure parameters for wildlife	Used to calculate potential wildlife risks and PRGs. The action to be taken under this alternative will mitigate risk to receptors through excavation of soil that exceeds the ecological PRG at DU 1-2 and 1-3.
Development and Validation of Bioaccumulation Models for Earthworms	ES/ER/TM-220	To Be Considered	Oak Ridge National Laboratory guidance on uptake of contaminants from soil to earthworms	Used to calculate potential wildlife risks and PRGs. The action to be taken under this alternative will mitigate risk to receptors through excavation of soil that exceeds the ecological PRG at DU 1-2 and 1-3.

To address the last part of the comment, "PRG" will be changed to "RG" and the words "(including GA Leachability Criteria)" will be added after "...RGs for industrial use..."

*EPA Specific Comment 32: App. D, Loc Table – The Action to be Taken text for the Endangered Species Act also needs to state: “Unused structures will be evaluated for overwintering bat habitat and, if present, appropriate mitigation measures for the remediation will be instituted in consultation with the USFWS.”*

Response: The requested text will be added.

*EPA Specific Comment 33: App. D, Act Table – The Action to be Taken text for TSCA should include all of the components of the remedy described in the TSCA determination (including LUCs and how demolition of the TVs will be addressed in the future). The discussion of the Determination should be in the present tense.*

*If a total of over an acre will be disturbed by remedial activities (accessways, staging areas, excavation areas, etc.) then federal and state NPDES stormwater standards also need to be cited.*

*It is assumed that excavations will be shallow enough so no dewatering will be required. If that is not the case then discharge standards need to be included for whatever means will be used to dispose of the water removed from the excavations (NPDES to surface waters, CWA pretreatment standards for discharge to a POTW, groundwater discharge standards, etc.).*

Response: For the TSCA ARAR, the Action to be Taken text will be revised as follows: “All soil exceeding Ecological and Industrial PCB cleanup levels at DU 1-2 and 1-3 will be excavated and disposed of off-site. LUCs will restrict residential and other unrestricted use for surface soil that will remain above the Residential RG. LUCs will also prevent exposure to soil beneath existing transformer vault foundations through maintenance of the transformer vault foundations, since that soil has not been assessed. If the transformer vaults are demolished in the future, the underlying soils will be assessed and remediated, if needed, to meet the Ecological and Industrial RGs. If and when TV2 and/or TV3 are demolished in the future, the demolition will meet TSCA protectiveness standards so as not to create a threat of release to the environment. The excavation, transportation, and management of PCB contaminated media will be performed in a manner to comply with TSCA, including air monitoring during remedial activities. The ROD includes a finding by the Director, Office of Site Remediation and Restoration, USEPA Region 1, that the remedy's soil PCB cleanup levels, along with the excavation and management of the contaminated media will not pose an unreasonable risk to human health or the environment.”

Based on the current estimated excavation extents, it does not appear that over an acre will be disturbed by excavation or associated staging and access.

Dewatering is not expected to be needed.

RIDEM Specific Comments:

*RIDEM Specific Comment 1. p. 8, Section 1.1, Site Name and Location, 1<sup>st</sup> sentence – Please change “Newport and Middletown” to “Portsmouth”.*

Response: The requested change will be made.

*RIDEM Specific Comment 2. pp. 8-9, Section 1.3, Assessment of Site – Please remove the 2<sup>nd</sup> paragraph from this section for consistency with the Proposed Plan. The team agreed that any potential groundwater releases from the Ethyl Blending Plant (EBP) will be addressed separately on a site-wide basis.*

Response: The paragraph will be removed.

*RIDEM Specific Comment 3. pp. 9-10, Section 1.4, Description of Selected Remedy, whole section – Please replace the word “would” with “will” throughout this section (i.e., LUCs will be required...).*

Response: The requested change will be made through Section 1.4.

*RIDEM Specific Comment 4. p. 9, Section 1.4, Description of Selected Remedy, 5<sup>th</sup> bullet – Please correct the end of the bullet to “has not been assessed”.*

Response: The typo will be corrected.

*RIDEM Specific Comment 5. p. 10, Section 1.4, Description of Selected Remedy, paragraph – This paragraph contains much of the same information included within the bullets. Please consider removing this paragraph or revising it as needed.*

Response: The paragraph will be revised as follows:

“Under this Selected Remedy, potential unacceptable human and ecological exposures to contaminated surface soil at DU 1-1, DU 1-2, and DU 1-3 will be eliminated through the combination of limited soil excavation and off-site disposal and LUCs. These actions will be supported by site inspections and five-year reviews. Implementation of this remedy will allow for continued industrial and restricted recreational use, which is consistent with the anticipated future uses for the site.”

*RIDEM Specific Comment 6. p. 10, Section 1.5, Statutory Determinations, 4<sup>th</sup> paragraph, 1<sup>st</sup> sentence – Please add in information regarding the remedial action for DU 1-1 (i.e., removal of soils above industrial RGs and implementation of land use controls [LUCs]). Also consider breaking up this long sentence into multiple shorter sentences for clarity.*

Response: This paragraph will be replaced with the text requested by EPA in EPA Specific Comment 6. Note also that the intent of the paragraph is to discuss the finding by EPA with respect to the selected remedy and TSCA and not to provide a general description of the proposed remedial actions.

*RIDEM Specific Comment 7. p. 13, Section 1.7.2, EPA Region 1 Signature – Please add in a sentence discussing the remedial actions proposed for DU 1-1.*

Response: The second paragraph under Section 1.7.2 is meant to provide EPA's specific finding with respect to the selected remedy and TSCA and not to provide a general description of the proposed remedial actions. Therefore, no change will be made.

*RIDEM Specific Comment 8. p. 14, Section 2.1, Site Name, Location, and Brief Description, 4<sup>th</sup> paragraph, 1<sup>st</sup> sentence – Please delete “is” (“Tank Farm 1 is enclosed...”).*

Response: The redundant “is” will be deleted.

*RIDEM Specific Comment 9. p. 19, Section 2.6, Conceptual Site Model – In the second paragraph, please add in a sentence regarding the presence of TPH. Additionally, this paragraph states that metal contaminants of concern (COCs) were not “highly elevated” above background concentrations; however, the background comparison did find metals concentrations at the site statistically higher than background levels. As written, the 4<sup>th</sup> and 5<sup>th</sup> sentences of this paragraph currently imply to the reader that metals are not COCs. Please delete or modify this sentence. The fifth paragraph states that surface soil is the primary source medium; however, while no COCs were identified in subsurface soil, contaminants are still present. The paragraph as written implies that subsurface soils are not impacted; please revise to indicate otherwise.*

Response: Regarding TPH, the following sentence will be added as a new third sentence in the second paragraph: “While TPH was detected in soil, concentrations were low and did not exceed RIDEM criteria.”

Regarding metals, the following sentence will be added to the end of the second paragraph to be consistent with the Proposed Plan: “However, higher concentrations of these metals seen in a small number of sample locations exceed CERCLA cleanup standards.”

Regarding the last part of the comment, the following sentence has been added to the end of the fifth paragraph: “While PAHs and metals were detected in subsurface soils at DU 1-1, the concentrations do not require action.”

*RIDEM Specific Comment 10. p. 20, Section 2.7, Nature & Extent – At the end of the second sentence, please add on the following clause “, and therefore, no remediation is proposed for subsurface soils”. Delete the 8<sup>th</sup> sentence (“Contaminants in subsurface soil...”), as the content is redundant.*

Response: The requested changes will be made.

*RIDEM Specific Comment 11. p. 21, Section 2.7.1, Nature, Extent, Fate and Transport of Contamination in Soil at DU 1-1, 1<sup>st</sup> paragraph, 5<sup>th</sup> sentence – Please correct the spelling of “regulated”.*

Response: The typo has been corrected.

*RIDEM Specific Comment 12. p. 25, Section 2.9.3, Exposure Assessment – Inhalation of fugitive dust was a pathway assessed in the human health risk screening evaluation (HHRSE). Please discuss this pathway in this section (text and Table 2-3).*

Response: The fourth sentence of the first paragraph of Section 2.9.3 will be modified to state: "...dermal contact with soil, ingestion of soil, and inhalation of fugitive dust." Additionally, "Inhalation of fugitive dust" will be added as an Exposure Route to each of the receptors listed in Table 2-3.

*RIDEM Specific Comment 13. p. 29, Section 2.9.6, Summary of Human Health Risks, DU 1-1 – In the first sentence, please change the end of the sentence to state that "...groundwater did not exceed the target level of 1."*

Response: The words "were less than" will be replaced with "did not exceed." Also, the reference to groundwater was included in error and will be deleted.

*RIDEM Specific Comment 14. p. 29, Section 2.9.7, Ecological Risk, DU 1-2 and 1-3 – In the first sentence, please change "one PCB" to "Aroclor 1260," and insert a period at the end of the sentence.*

Response: The requested changes have been made.

*RIDEM Specific Comment 15. p. 40, Section 2.12.2.3, Short-Term Effectiveness – In the first sentence of the last paragraph on the page, Alternative S-1 is discussed. However, Alternative S-1 is not a viable alternative as no action is taken to manage risks, and thus should not be included in the discussion of short-term effectiveness.*

Response: All remedial alternatives are carried through the comparative analysis, consistent with EPA guidance. No change will be made.

*RIDEM Specific Comment 16. p. 45, Section 2.14.2, LUCs and Inspections, 2<sup>nd</sup> paragraph, 5<sup>th</sup> sentence – Please correct the end of this sentence ("would incorporate and land use restrictions.")*

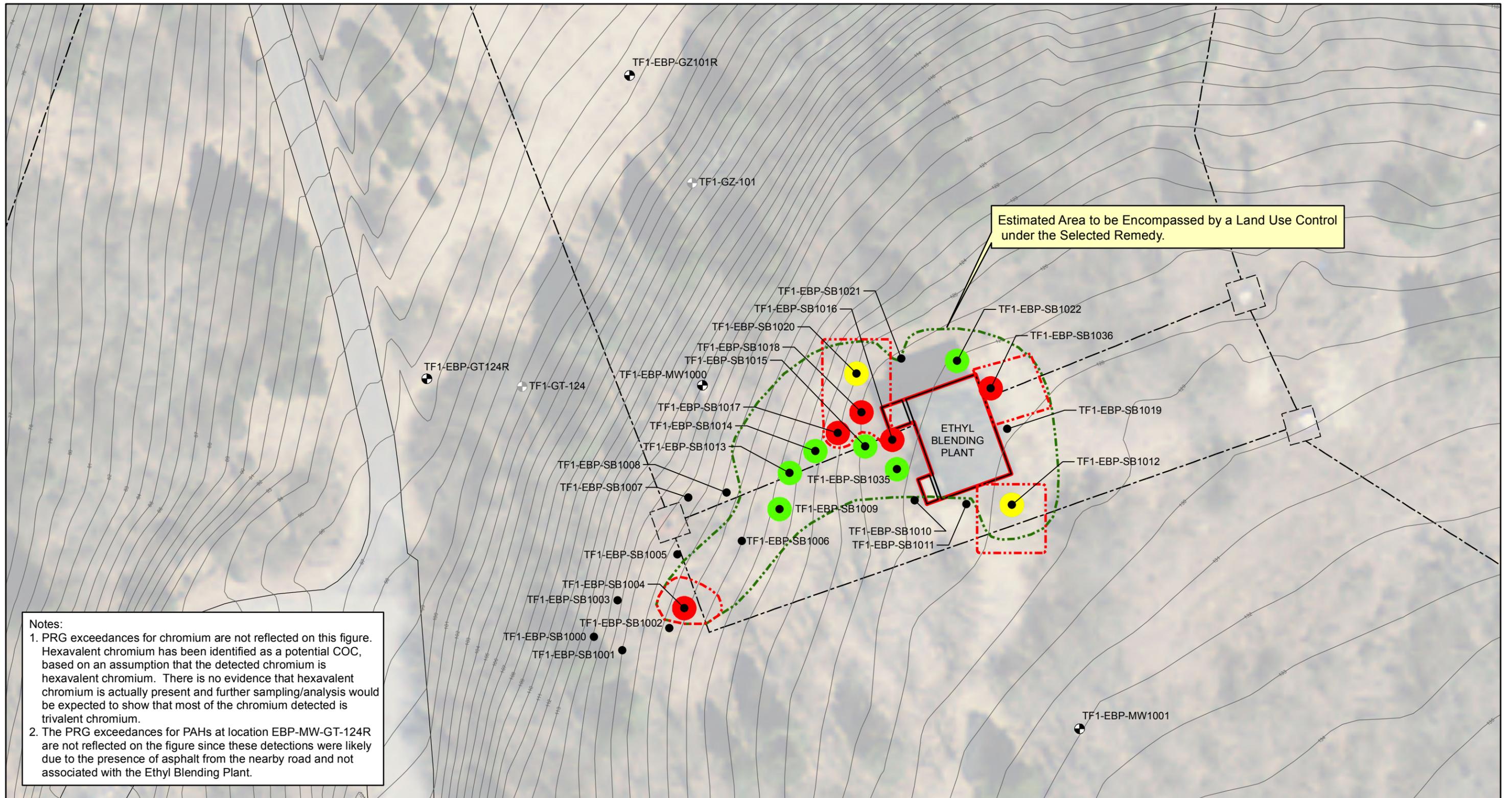
Response: The word "and" will be removed from the referenced phrase.

*RIDEM Specific Comment 17. p. 45, Section 2.14.3, Expected Outcomes of Selected Remedy – In the third sentence of the first paragraph, please correct the misspelling of "anticipated."*

Response: The typo will be corrected.

*RIDEM Specific Comment 18. Figures 3, 4 and 5 – These figures depict the limits of excavation as well as long-term LUCs. Please consider also depicting the limits for short-term LUCs around the existing structures.*

Response: The requested changes will be made. See attached revised figures.



Notes:  
 1. PRG exceedances for chromium are not reflected on this figure. Hexavalent chromium has been identified as a potential COC, based on an assumption that the detected chromium is hexavalent chromium. There is no evidence that hexavalent chromium is actually present and further sampling/analysis would be expected to show that most of the chromium detected is trivalent chromium.  
 2. The PRG exceedances for PAHs at location EBP-MW-GT-124R are not reflected on the figure since these detections were likely due to the presence of asphalt from the nearby road and not associated with the Ethyl Blending Plant.



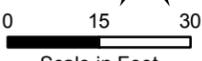
Drawn: JB 05/12/2016  
 Approved: NO 05/12/2016  
 Project #: 60266436

**Legend**

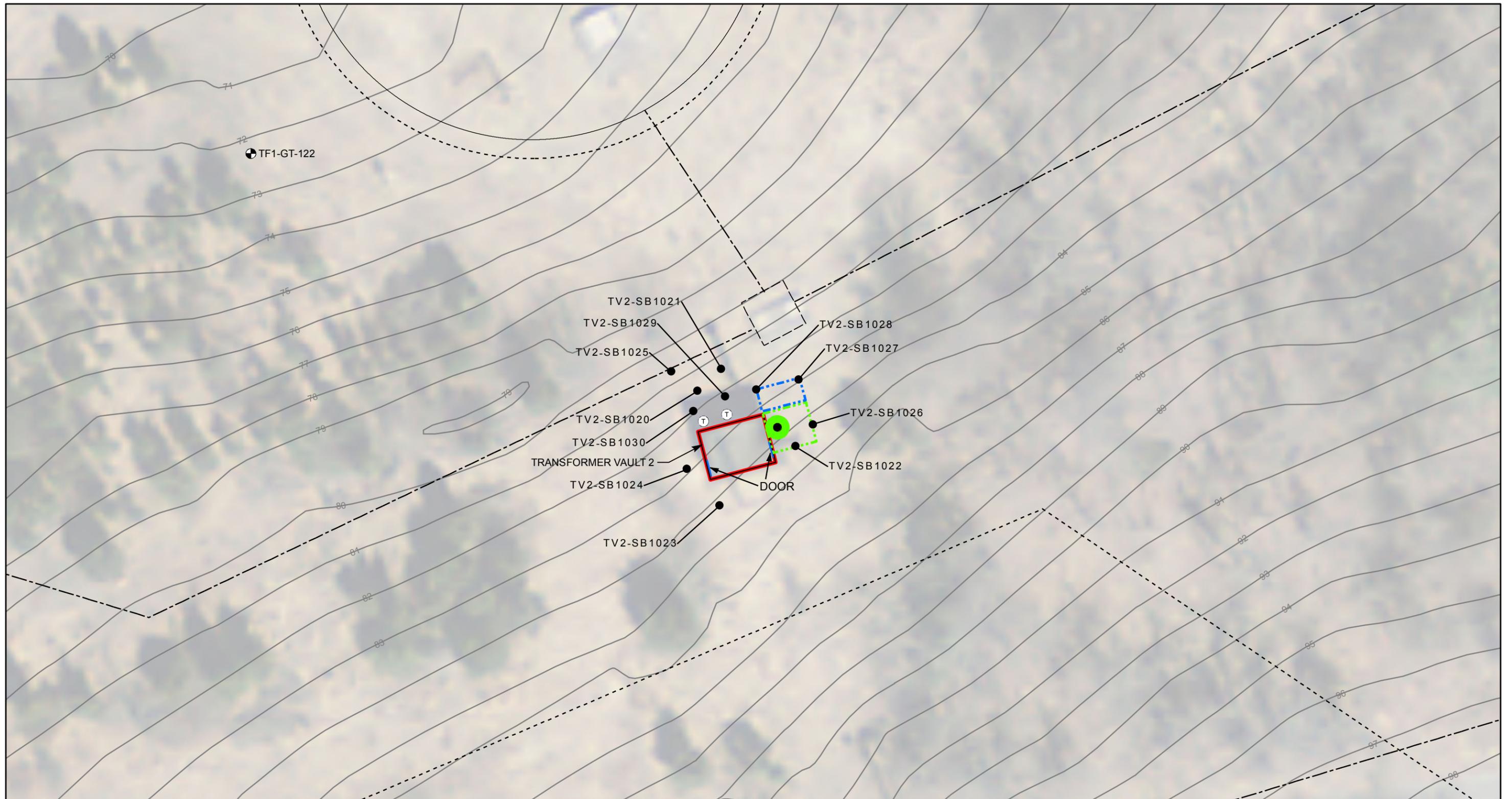
-  Existing Monitoring Well
-  Abandoned or Destroyed Monitoring Well
-  Soil Boring
-  Petroleum Distribution (Remaining)
-  Ring Drain/BSW Drainage (Remaining)
-  Exceeds Residential and Industrial PRGs (including GALC)
-  Exceeds Residential PRGs
-  Exceeds Residential and Industrial PRGs

PRG = Preliminary Remediation Goal  
 GALC = GA Leachability Criteria

-  Estimated Area to be Encompassed by a Land Use Control under the Selected Remedy
-  Estimated Extent of Excavation under the Selected Remedy (based on Ind PRG Exceedances)
-  Area to require Land Use Controls to maintain the structure foundation to prevent access to underlying soils

  
  
 Scale in Feet

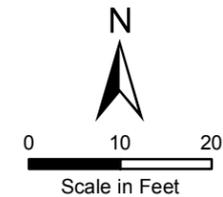
**FIGURE 3**  
 SELECTED SOIL REMEDIATION FOR  
 DECISION UNIT 1-1  
 RECORD OF DECISION  
 TANK FARM 1 (SITE 7)  
 DECISION UNITS 1-1, 1-2, 1-3  
 NAVSTA NEWPORT, RHODE ISLAND



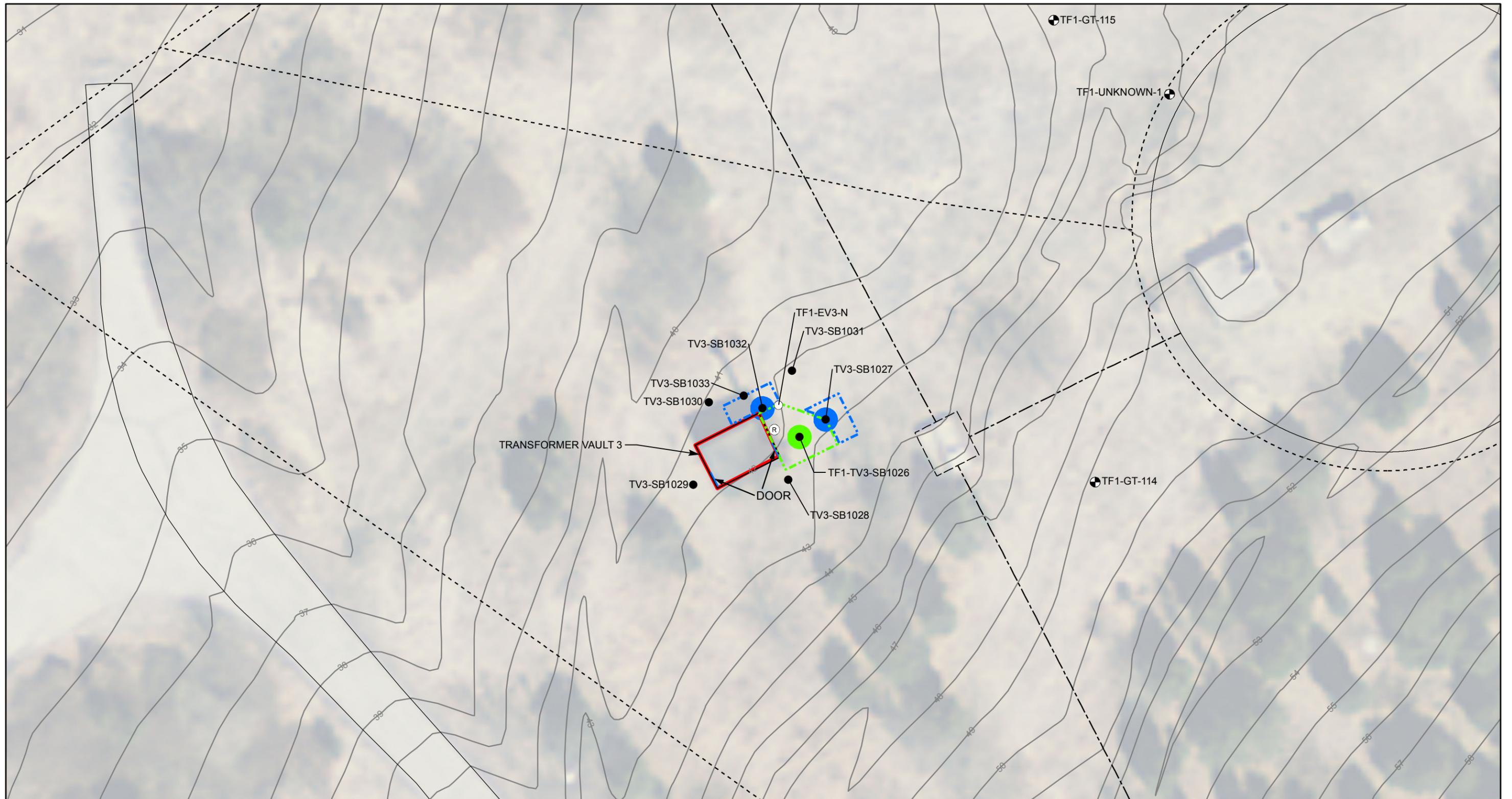
Drawn: JB 05/12/2016  
 Approved: NO 05/12/2016  
 Project #: 60266436

**Legend**

- Monitoring Well Location
- 2012-2013 Soil Boring
- 2010 Site Investigation Soil Sample
- Industrial and Ecological PRG Exceedance
- PRG = Preliminary Remediation Goal
- Estimated Area to be Excavated under the Selected Remedy
- Estimated Areas to require Land Use Controls preventing Residential Use under the Selected Remedy
- Area to require Land Use Controls to maintain the structure foundation to prevent access to underlying soils
- T Transformer
- Petroleum Distribution (Remaining)
- Ring Drain/BSW Drainage (Remaining)



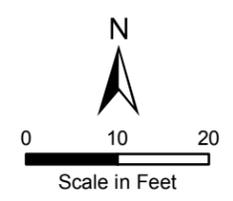
**FIGURE 4**  
 SELECTED SOIL REMEDY  
 DECISION UNIT 1-2  
 RECORD OF DECISION  
 TANK FARM 1 - SITE 7  
 DECISION UNITS 1-1, 1-2, 1-3  
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 Approved: NO 05/12/2016  
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**Legend**

- Existing Monitoring Well
- 2010 Site Investigation Soil Sample
- 2012-2013 Soil Boring
- Ⓡ Rectifier
- Residential
- Residential and Ecological
- Estimated Area to be Excavated under the Selected Remedy
- Estimated Areas to require Land Use Controls\* preventing Residential Use under the Selected Remedy
- Petroleum Distribution (Remaining)
- Ring Drain/BSW Drainage (Remaining)
- Area to require Land Use Controls to maintain the structure foundation to prevent access to underlying soils
- PRG = Preliminary Remediation Goal



**FIGURE 5**  
 SELECTED SOIL REMEDY FOR  
 DECISION UNIT 1-3  
 RECORD OF DECISION  
 SITE 7 - TANK FARM 1  
 DECISION UNITS 1-1, 1-2, 1-3  
 NAVSTA NEWPORT, RHODE ISLAND