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FINAL EXPLANATION OF SIGNIFICANT DIFFERENCES SITE 17 FORMER BUILDING 32 AT
GOULD ISLAND OPERABLE UNIT 6 (OU 6) NS NEWPORT RI
08/01/2016
RESOLUTION CONSULTANTS



Explanation of Significant Differences

Site 17, Former Building 32 at Gould Island (OU 6)

Naval Station Newport, Rhode Island

Expansion of the Soil Excavation Area 2 Footprint

INTRODUCTION AND STATEMENT OF PURPOSE

An Explanation of Significant Differences (ESD) is required for Site 17, Former Building 32 at Gould Island, within Naval Station (NAVSTA) Newport, Rhode Island. Site 17 is classified as Operable Unit (OU) 6. This ESD modifies the 2014 Record of Decision (ROD) by expanding the footprint for Soil Excavation Area 2. The modification is significant because it increases the volume of soil requiring removal and disposal required under the ROD, but does not fundamentally alter the overall cleanup approach documented in the ROD.

The Navy is the lead agency, with oversight from the United States Environmental Protection Agency (EPA) and Rhode Island Department of Environmental Management (RIDEM), for cleanup of sites at NAVSTA Newport in the Installation Restoration Program (IRP) under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) as modified by the Superfund Amendments and Reauthorization Act of 1986 (SARA).

The ROD for Site 17 was signed by the Navy on June 27, 2014 and signed by EPA on June 30, 2014. The Navy is issuing this ESD as part of the public participation requirements under Section 117(c) of CERCLA, Section 300.435(c)(2)(i) of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), and the Navy IRP. In accordance with Section 300.825(a)(2) of the NCP, this ESD will become part of the Administrative Record for the facility. The Administrative Record also contains background information that was used in determining the selected remedy, as documented in the ROD, and in preparing this ESD. The Administrative Record for NAVSTA Newport is included as part of the Information Repository, which is available for review at the following web site: <http://go.usa.gov/DyNw>.

SITE HISTORY, CONTAMINATION, AND SELECTED REMEDY

The ROD described the selected remedy for soil, groundwater, and sediment at Site 17. The soil remedy includes excavating soil containing chemicals of concern (COCs) at concentrations exceeding

remedial goals (RGs) to the lowest depth where the RG exceedance was detected. The sediment remedy consists of dredging contaminated sediment, and the groundwater remedy consists of monitored natural attenuation (MNA). The selected remedy for Site 17 also includes applying land use controls (LUCs), and conducting five-year reviews.

The ROD identified six separate soil removal areas. Soil Excavation Area 2, which is the subject of this ESD, is located within the Former Building 44 (Former Fuel Pump House) Underground Storage Tank (UST) Area, northeast of the Building 32 concrete slab. The COCs included in the ROD for Soil Excavation Area 2 are polycyclic aromatic hydrocarbons (PAHs). The Remedial Design (RD) estimated an area of 20-feet by 20-feet by 6-feet of PAH-impacted soil would require removal at Soil Excavation Area 2.

BASIS FOR THE DOCUMENT

Per the ROD, Excavation Area 2 was refined during the RD to include an estimated excavation area of 20-feet by 20-feet by 6-feet. However, during remedial activities in April through May 2016 the confirmation samples collected from the initial excavation area exceeded RGs. A visual inspection of the excavation and analytical results indicated that the source of the PAHs was fill material consisting of crushed bricks and soil. To define the limits of the expanded PAH impacts, test pitting was conducted. Test pitting indicated that the limits of the fill material and associated PAH-impacted soil expanded Soil Excavation Area 2 from the initial estimate to 150-feet by 120-feet by 6 feet deep. An ESD is required because this area is much larger than the area depicted in the ROD and the subsequent cost of the remediation has increased by 74% (i.e., greater than 50%). The initial and expanded limits of Soil Excavation Area 2 are shown on Figure 1.

DESCRIPTION OF SIGNIFICANT DIFFERENCES

The significant difference in site conditions is the expansion of Soil Excavation Area 2 beyond what was depicted in the ROD and RD and the associated increased cost of the remediation. Based on this expansion, an additional 6,000 tons of impacted soils

requires excavation and disposal, above the approximately 1,580-ton estimate provided in the ROD.

This change to the selected remedy will still be protective of human health and the environment as presented in the ROD, and as documented in this ESD.

SUPPORT AGENCY COMMENTS

EPA and RIDEM representatives, as part of the NAVSTA Newport IR Team, have had ongoing involvement in the decision-making process associated with this new finding and subsequent change in the Site 17 selected remedy. The Navy has obtained concurrence from RIDEM on the modification to the selected remedy for Site 17 as described in this ESD.

STATUTORY DETERMINATIONS

The Navy acknowledges the additional contamination present in subsurface soil at Site 17. The remedy documented in the ROD, which includes removal and disposal, is an appropriate response action for the additional contamination identified at Soil Excavation Area 2.

Apart from the additional volume of soil included at Soil Excavation Area 2, there is no other significant change to any component of the remedy. The proposed change to the selected remedy will continue to satisfy the statutory requirements of CERCLA Section 121, and the modified remedy will remain protective of human health and the environment and will continue to comply with federal and state ARARs and to be cost effective.

PUBLIC PARTICIPATION

Public participation requirements as outlined in the NCP, Section 300.435 (c) (2) (i), have been met by including this ESD in the Administrative Record for Site 17 and by publishing in local newspapers a notice of availability of the ESD. In addition, the Navy regularly meets to discuss the status and progress of the IRP with the Restoration Advisory Board (RAB), which includes representatives from the local community. Representatives from the Navy, EPA, and RIDEM attend these meetings. The expanded size of Excavation Area 2 at Site 17 was discussed at the RAB meeting on July 20, 2016.

FOR MORE INFORMATION

If you have questions or would like further information about the ESD for Site 17 at NAVSTA Newport, please contact:

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Newport, RI 02841-1512
401-841-3538

Ms. Kimberlee Keckler
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DECLARATION

PAHs in excess of the remedial goals for Site 17 were identified outside the estimated limits of the remedial excavation area at Area 2. The footprint of Area 2 increased from an area of 20-feet by 20-feet by 6-feet to an area of 150-feet by 120-feet by 6 feet with an additional 6,000 tons of soil requiring removal and disposal. The subsequent cost of the remediation has increased by 74% (i.e., greater than 50%). Therefore, an ESD to the 2014 ROD is needed to document the additional costs and volume of soil to be removed from Soil Excavation Area 2. For the foregoing reasons, by my signature below, I approve the issuance of this Explanation of Significant Difference for the Record of Decision for Site 17 at NAVSTA Newport.

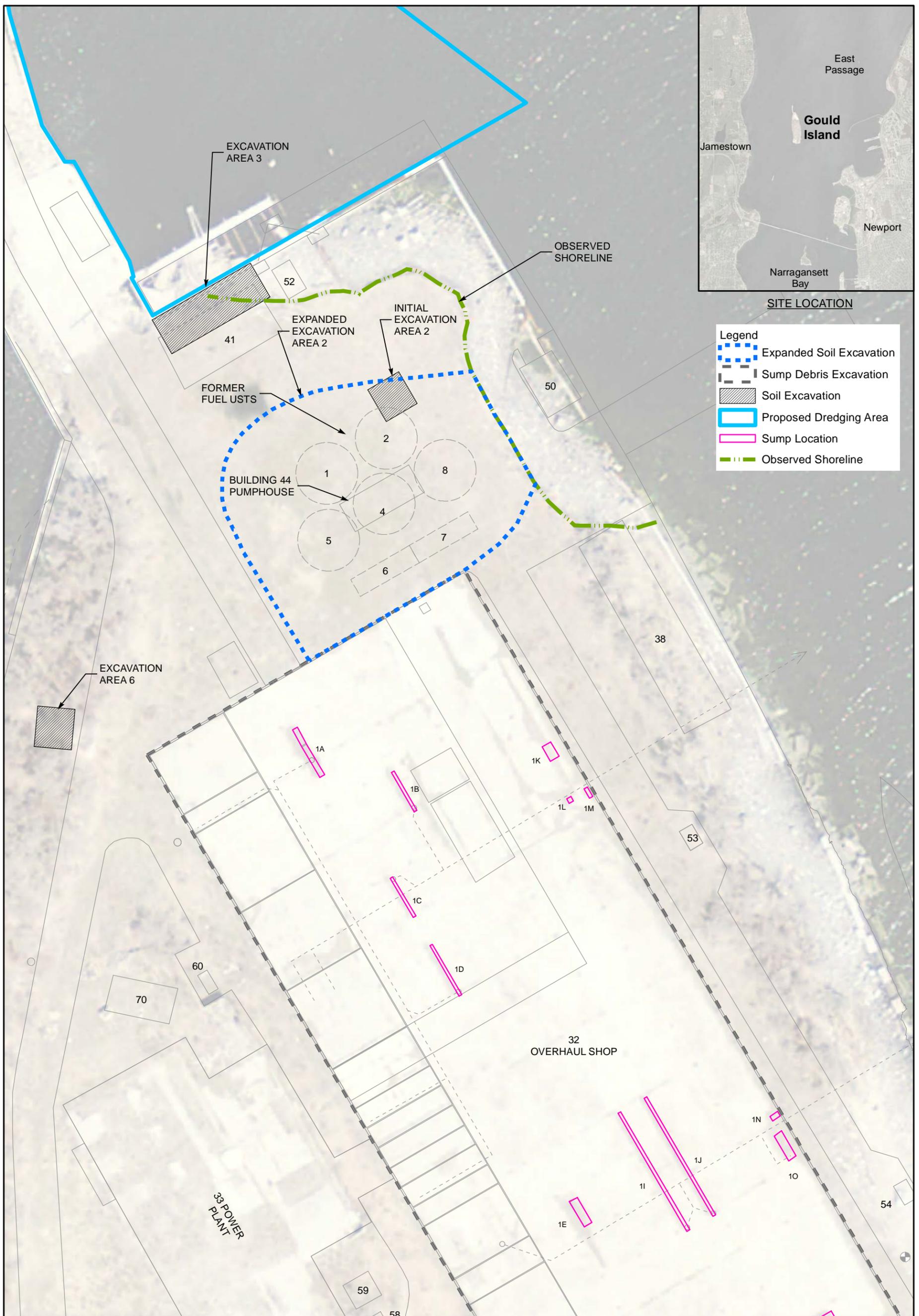
United States Department of the Navy: United States Environmental Protection Agency:



Captain D. R. D. Boyer 13 Sep 16 Date
Commanding Officer, NAVSTA Newport



Bryan O. Olson 9/21/16 Date
Director
Office of Site Remediation and Restoration
U.S. EPA Region 1



Legend

- Expanded Soil Excavation
- Sump Debris Excavation
- Soil Excavation
- Proposed Dredging Area
- Sump Location
- Observed Shoreline

 RESOLUTION CONSULTANTS		
Drawn:	JB	08/11/2016
Approved:	MK	08/11/2016
Project #:	60268619	

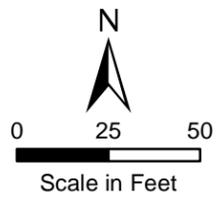


FIGURE 1
EXPANDED EXCAVATION AREA 2

SITE 17 - GOULD ISLAND
NAVSTA NEWPORT, RHODE ISLAND



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

15 September 2016

Bryan O. Olson, Director
U.S. EPA, Region I
Office of Site Remediation and Restoration
5 Post Office Square
Suite 100 (OSRR 07-5)
Boston, MA 02109-3912

RE: Site 17 – Former Building 32 at Gould Island
Naval Station Newport, Rhode Island

Dear Mr. Olson:

The Office of Waste Management has conducted a review of the *Explanation of Significant Differences* (ESD), dated August 2016, for Site 17 – Former Building 32 at Gould Island, Naval Station Newport, Rhode Island. The ESD documents the expansion of the footprint of Soil Excavation Area 2. This expansion significantly increases the volume of soil requiring removal and disposal resulting in a 74% cost increase for the soil component of the remedy. As a result of this review, the Department concurs with this ESD.

If you have any questions, please feel free to contact Matthew DeStefano of my staff at (401) 222-2797, extension 7141.

Sincerely,

Leo Hellested, P.E., Chief
Office of Waste Management
Dept. of Environmental Management

cc: Matthew DeStefano, RIDEM
Pamela Crump, RIDEM
Anni Loughlin, USEPA
Kymberlee Keckler, USEPA
Jim Gravette, NAVFAC MIDLANT