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FINAL EXPLANATION OF SIGNIFICANT DIFFERENCES GOULD ISLAND SITE 19 ON-SHORE DERECKTOR SHIPYARD OPERABLE UNIT 12 (OU 12) NS NEWPORT RI

08/01/2016

RESOLUTION CONSULTANTS

Explanation of Significant Differences
Site 19, On-Shore Derecktor Shipyard (OU 12)
Naval Station Newport, Rhode Island
Incorporation of Site 4 Groundwater into Site 19 On-Shore

Introduction and Statement of Purpose

An Explanation of Significant Differences (ESD) is required for Site 19, On-Shore Derecktor Shipyard, Naval Station (NAVSTA) Newport, Rhode Island. Site 19 On-Shore is classified as Operable Unit (OU) 12. This ESD modifies the 2014 Record of Decision (ROD) by incorporating Site 4 into OU 12 and adding remediation of Site 4 groundwater into the groundwater response actions for Site 19 groundwater. The ESD also adds a determination that No Action is required for soil within Site 4. The modification is significant because it expands the limits of Site 19 to include Site 4 and it also adds chromium as a chemical of concern (COC). These changes do not fundamentally alter the overall cleanup approach documented in the Site 19 onshore 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.

The OU 12 ROD for Site 19 On-Shore was signed by the Navy on September 12, 2014 and signed by EPA on September 14, 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

Derecktor Shipyard

Site 19, the Former Derecktor Shipyard, is located at Coddington Cove in the central portion of NAVSTA Newport, and occupies land within both Middletown and Newport. It is composed of approximately 41 acres of shoreline land and improvements and the adjacent deep water industrial port in Coddington Cove that were formerly leased to Robert E. Derecktor Shipyards of Rhode Island, Inc. (Derecktor, Inc.).

Contaminants in soil and groundwater were identified during past environmental assessments at the Former Derecktor Shipyard and were attributed to previous activities, mainly those activities undertaken by Derecktor, Inc. (repair, maintenance, and construction of private and military ships), during their lease period from 1979 through 1992. The ROD described the selected remedy for soil and groundwater at Site 19. The soil remedy includes soil cover and land use controls (LUCs) and the selected groundwater remedy consists of monitored natural attenuation (MNA) and LUCs. The selected remedy for Site 19 On-shore also includes conducting five-year reviews. There was a separate ROD and there are separate ongoing response actions for Site 19 Off-shore (OU 5), which is unaffected by this ESD.

Groundwater COCs identified in the ROD include: Trichloroethene (TCE), Vinyl Chloride, Arsenic, Cobalt, Iron, and Manganese. The remedial goals (RGs) included in the Site 19 On-shore ROD for these COCs are listed in the inset table included within this ESD.

Codington Cove Rubble Fill Area

The Codington Cove Rubble Fill Area, Site 4, is an 8-acre vegetated area located adjacent to the southeast of Site 19. From 1978 to 1982, Site 4 was a disposal area for inert rubble fill including concrete, asphalt, metal, slate, wood, brush, etc. In August 2014, a Study Screening Area Evaluation report was finalized, documenting no action for soil (including rubble fill), sediment, and surface water, but with the recommendation to further assess arsenic, chromium, cobalt, iron, and manganese in groundwater. In April

2016, a Supplemental Groundwater Evaluation Report concluded that that arsenic in groundwater at Site 4 exceeded the federal maximum contaminant level (MCL) during multiple sampling events and requires a response action.

BASIS FOR THE DOCUMENT

Based on the similarity of groundwater conditions at Sites 4 and 19 and their proximity to each other, the Navy, EPA, and RIDEM agreed to incorporate Site 4 into OU 12; determining no action is required for Site 4 soil, sediment or surface water; and adding remediation of Site 4 groundwater into the groundwater response actions for OU 12. The expanded groundwater area that incorporates Site 4 into the Site 19 groundwater LUC, MNA and long-term monitoring (LTM) program is shown on Figure 1.

DESCRIPTION OF SIGNIFICANT DIFFERENCES

Through this document Site 4 will be incorporated into OU12. The Supplemental Groundwater Evaluation Report documents that groundwater LTM parameters for Site 4 will be limited to the five metals identified as contributing to potential risks (arsenic, chromium, cobalt, iron, and manganese). These five metals overlap with the Site 19 COCs, with the exception of chromium. Per this ESD, groundwater at Site 4 will be incorporated into the Site 19 On-shore MNA remedy and LTM program. Groundwater at Site 4 will be required to achieve Site 19 cleanup levels included in the ROD. In addition, groundwater at Site 4 will also be required to meet a groundwater cleanup level of 100 µG/L for chromium, which is the federal MCL. Refer to the inset table for a summary of COCs and RGs for the expanded OU12 On-shore MNA and LTM program.

Chemical of Concern (COC)	Remedial Goal (RG), µG/L
TCE	5
Vinyl Chloride	2
Arsenic	10
Cobalt	4.7
Iron	11,000
Manganese	300
Chromium*	100

Notes:
* Additional COC for groundwater to incorporate Site 4 into the Site 19 groundwater response actions. Only applies to Site 4 area and portions of Site 19 located downgradient of Site 4.

The Navy has evaluated the groundwater attenuation factors evaluated for Site 19 and determined that the MNA analysis used for Site 19 are also applicable to Site 4. The groundwater LTM parameters for Site 4 include arsenic, chromium, cobalt, iron, and manganese. MNA is expected to be successful because of the relatively low levels of contamination and their susceptibility to geochemical changes in the aquifer that occur. The Navy will assess groundwater at Site 4 to analyze trends. The available site data indicate that MNA will be successful over time, currently estimated at 30 years for metals. The time required will be re-evaluated in the Five-Year reviews for NSN. A monitoring program will be developed for Sites 19 and 4 that will confirm that the expected attenuation rates will be achieved and that Site 4 will achieve the groundwater Remedial Action Objectives established in the OU12 ROD. Installation of monitoring wells and other groundwater remedial infrastructure needed to implement the groundwater remedy within Site 4 will meet the ARARs requirements identified in the OU12 ROD. The added cost of implementing an MNA remedy at Site 4 is $ 628,897 more than the $ 2,231,900 cost of the OU 12 ROD remedy which is an approximate 28% increase.

The current and anticipated future use of groundwater in Site 4 and Site 19 are the same. Therefore, the groundwater LUCs for Site 19 will also be applied to Site 4 and will be documented in a revised LUC RD for Site 19. These LUCs prohibit installation of groundwater supply wells, including public and private drinking water wells and residential irrigation wells, and prohibit use of groundwater until groundwater cleanup standards are achieved. The Site 19 soil LUC will not extend to Site 4.

This change to the selected remedy will still be protective of human health and the environment as presented in the ROD, and with regard to the incorporation of Site 4 into OU 12 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 OU 12 selected remedy. The Navy has obtained concurrence from RIDEM on the modification to the selected remedy for OU 12 as described in this ESD.

STATUTORY DETERMINATIONS

The Navy acknowledges the incorporation of remediation of Site 4 groundwater into the response actions for OU 12. The remedy documented in the 2014 ROD, which includes MNA and LUCs, is an appropriate response action for groundwater contamination at Site 4. No action is required for soil, sediment, or surface water within Site 4.

The scope, performance, and cost of the remedy are not significantly altered by the incorporation of groundwater at Site 4. There is no significant change to any other 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 19 and by publishing in local newspapers a notice of availability of the ESD within two weeks of regulatory concurrence on the document. 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 incorporation of Site 4 groundwater into the groundwater response actions for Site 19 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 19 at NAVSTA Newport, please contact:

Ms. Lisa Rama
Public Affairs Office
690 Peary Street
Naval Station Newport
Newport, RI 02841-1512
401-841-3538

Ms. Kymberlee Keckler
Remedial Project Manager
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Suite 100
Mail Code: OSRR07-1
Boston, MA 02109-3912
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Ms. Pamela Crump
RIDEM Project Manager
Rhode Island
Department of Environmental Management
235 Promenade St.
Providence, RI 02908-5767
Telephone: (401) 222-2797 ext. 7020
E-mail: pamela.crump@dem.ri.gov

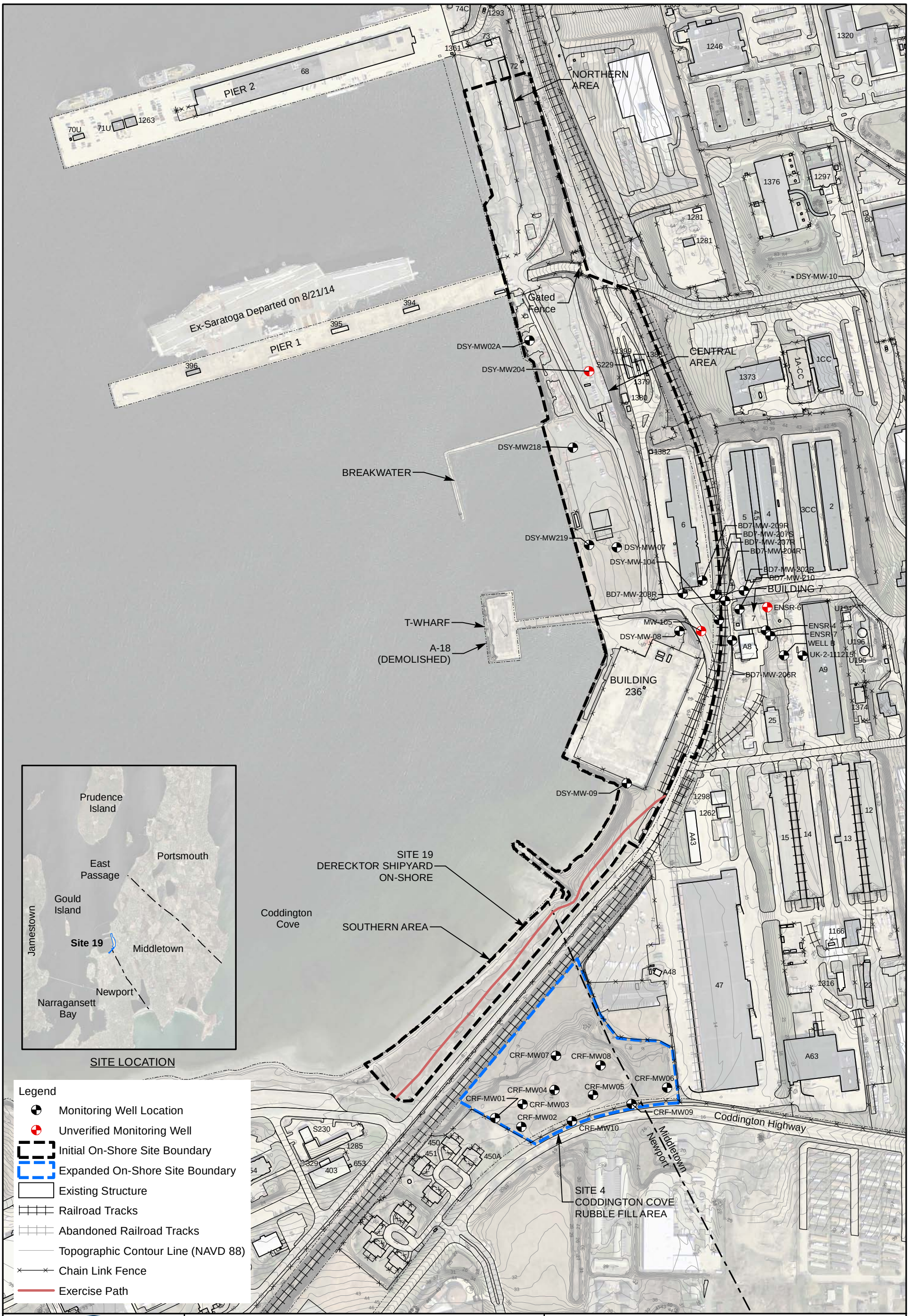
DECLARATION

Site 4 groundwater, which is contaminated with metals, will be added to the remedy for Site 19 groundwater, which includes monitored natural attenuation and land use controls. Therefore an ESD to the 2014 ROD is needed to document the expansion of the limits of Site 19 to include groundwater at Site 4 and to add chromium as a chemical of concern. 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 19 at NAVSTA Newport.

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

19Sep16
Captain D. R. D. Boyer Date
Commanding Officer, NAVSTA Newport

Nancy Barmakian for 09/22/16
Bryan O. Olson Date
Director
Office of Site Remediation and Restoration
U.S. EPA Region 1



RESOLUTION CONSULTANTS

Drawn:	JB	08/11/2016
Approved:	MK	08/11/2016
Project #:	60436343	

FIGURE 1
EXPANDED GROUNDWATER AREA

SITE 19 - DERECKTOR SHIPYARD ONSHORE AND OFFSHORE NAVSTA NEWPORT, RHODE ISLAND

Path: P:\Govt\Projects\NavyCLEAN AECOM-EnSafe JV\Newport\GIS\Projects\DerecktorShipyard\Expanded_Site_Boundary\MXD\Fig_1_Site_19_Expanded_GW_Area.mxd

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 19 – On-Shore Derecktor Shipyard
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 19 – On-Shore Derecktor Shipyard, Naval Station Newport, Rhode Island. The ESD documents the expansion of the limits of On-Shore Derecktor Shipyard to include the groundwater from Site 4 – Coddington Cove Rubble Fill Area. It also adds chromium as a groundwater chemical of concern. 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

Notice to Adjacent Property Owner

DEPARTMENT OF THE NAVY

NAVAL STATION NEWPORT
690 PEARY STREET
NEWPORT, RHODE ISLAND 02841-1522

IN REPLY REFER TO:

5090
Ser PRR41/476

SEP - 1 2016

Peter Alviti, Jr. P.E.
Director
Rhode Island Department of Transportation
Two Capitol Hill
Providence, RI 02903

RE: Draft Explanation of Significant Difference Site 19 On-Shore Soil and Groundwater Operable Unit 12 (OU12) Naval Station (NAVSTA) Newport, Rhode Island

Dear Mr. Alviti:

The Navy is providing the attached draft Explanation of Significant Difference (ESD) for Site 19, On Shore Derecktor Shipyard, Soil and Groundwater Operable Unit 12 (OU12) for your review. The purpose of the ESD is to expand the groundwater remedy for Site 19 to also include nearby Site 4. The ESD also adds a determination that No Action is required for soil within Site 4. The reason the Navy is providing this ESD for Rhode Island Department of Transportation (RIDOT) review is that a RIDOT owned railway right-of-way is located directly adjacent to both Site 19 and Site 4 (see Figure 1 in attached ESD).

This letter and opportunity for review of the ESD acts as a notice that the Navy will assess groundwater contamination near the RIDOT owned property. If groundwater contamination is determined to be present within the limits of the RIDOT property, the Navy will be responsible for investigating and remediating the groundwater contamination.

The Navy is providing a 15-day review period. Please provide any comments on or before Sept 19, 2016. Following the 15-day review period, the ESD will be finalized and added to the administrative record for Site 19.

Please provide any questions or comments to either Deb Moore, Navy Installation representative (401-841-1790), or Jim Gravette, Navy RPM (757-341-2014).

Sincerely,

D. D. DOROCZ
Environmental Division Director
By direction of the
Commanding Officer

Enclosure: (1) Draft Explanation of Significant Difference Site 19 On-Shore Soil and Groundwater Operable Unit 12 (OU12) Naval Station (NAVSTA) Newport, Rhode Island

Copy to:
Gravette, James (NAVFACMIDLANT)
Kauffman, Mark (AECOM)
Kelly, Julie (AECOM)