



RHODE ISLAND  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767 TDD 401-831-5508

February 26, 2001

James Shafer, Remedial Project Manager  
U.S. Department of the Navy  
Northern Division  
Naval Facilities Engineering Command  
10 Industrial Highway  
Code 1823-Mail Stop 82  
Lester, PA 19113-2090

RE: Schedule Extension for Draft Feasibility Study for Old Fire Fighter Training Area,  
Naval Station Newport, Newport, Rhode Island

Dear Mr. Shafer,

The Rhode Island Department of Environmental Management, Office of Waste Management (RIDEM) has received the letter dated 22 February 2001 concerning the Navy's request for a schedule extension for the draft Feasibility Study for the Old Fire Fighter Training Area (OFFTA) from February 24, 2001 to April 25, 2001. The Navy cites regulatory delays in acceptance of the revised draft report as the reason for the need for the schedule extension. Specifically, the Navy notes that there was regulatory delays in the State's acceptance of the exposure parameters for the human health risk assessment, and the background soil metals concentration. The Navy also cites a letter from the RIDEM dated 5 December 2000, which states the RIDEM, does not accept the report and certain associated components.

The RIDEM position on these issues predates the cited 5 December 2000 letter. In correspondence dated 18 June 1998 and 12 July 2000 the RIDEM stated that the parameters to be employed in the human health risk assessment were unacceptable as they were inconsistent with requirements held at other sites in this state. As a result, RIDEM stated that it could not approve any subsequent report or remedial decision based on these assessments.

In correspondence dated 7 April 1999, 8 September 1999, 28 October 1999, 18 February 2000 and 26 April 2000 RIDEM raised concerns with respect to the ecological risk assessment. In the latter correspondence RIDEM noted that these concerns had not been resolved and therefore, RIDEM could not accept any conclusions or remedial decisions based upon this report. At that time RIDEM stated that it would not enter into dispute resolution in the hope that these issues could be resolved in the Remedial Investigation Report which the Navy was preparing to submit to the State. During this process,

RIDEM also offered a number of alternatives to the Navy in an attempt to resolve the problem.

In correspondence dated 16 June 2000, 18 August 2000 and 29 September 2000 RIDEM raised concerns with respect to the background study and noted that the Navy failed submit information as outlined in the approved work plan. In addition, in numerous correspondences for the McAllister Point Landfill site and the Derecktor Shipyard site, RIDEM stated that it did not accept the Preliminary Remediation Goals process for these sites.

RIDEM feels that during the above processes there was adequate time for the Navy to address these issues. However, RIDEM is also aware of the significant progress that has recently been made at this site. Consistent with similar actions carried out through the State, the Navy will be employing the RIDEM soil standards at this site. In addition, the Navy will be using a background soil value that was derived using procedures, which are in line with studies done at other sites in the State. Therefore, in light of the recent progress the RIDEM approves the Navy request for a schedule extension.

RIDEM looks forward to working with the Navy to resolve the remaining issues at the site. If the Navy has any question concerning the above please contact this Office at 401-222-2797, ext. 7111.

Sincerely,



Paul Kulpa  
Office of Waste Management

cc: Richard Gottlieb, DEM OWM  
Kymberlee Keckler, EPA Region I  
Melissa Griffin, NSN

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