



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 REGION 1
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 BOSTON, MASSACHUSETTS 02114-2023

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 NAVSTA NEWPORT RI
 5090 3a

August 17, 2001

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

Re: Technical Review of the Final Remedial Investigation for the Old Fire Fighting Training Area at the Naval Station Newport, Newport, RI

Dear Mr. Shafer:

EPA reviewed the *Final Remedial Investigation for the Old Fire Fighting Training Area* dated July 2001 for technical sufficiency, applicable regulations, EPA guidance, generally accepted practice and incorporation of EPA comments on the draft. Although the majority of the modifications were adequate, items requiring further attention are identified below. The comments are organized according to the date of the response to comments and the original comment number.

Response to Comments - Comments dated November 20, 2000

General Comments

No.

1 The Navy response indicated that Section 8.0, Summary and Conclusions would be revised to include discussions of data limitations and uncertainty, recommendations for further characterization and recommendations concerning a Feasibility Study (FS). However, Section 8.0 does not include identification of data gaps or specific recommendations for further characterization. For example, the Navy has indicated that additional sampling and investigation of soils adjacent to the clay pipe and oily sludge in the area of TP-1A will be conducted as part of an FS or site remediation. Additional examples are cited in the Specific Comments below. This additional sampling should be included in the recommendations presented as part of Section 8.0. Please revise Section 8.0 to include a summary of all such recommendations and an identification of any data gaps to be addressed in the FS.

Specific Comments

<u>No.</u>	<u>Page</u>	<u>Comment/ Comment Upon Review of Final RI</u>
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1. p. 1-13, §1.4.2 Upon closure of the Fire Fighting Training Area (FFTA) the on-site structures were demolished and buried. The report does not specify whether the oil water separators and associated underground piping, discussed in this section, were included in the debris which was buried on-site. Please provide the disposition of these underground storage tanks and associated underground piping. Alternatively, the report should recommend studies to evaluate the central drumlin on-site or other suspected burial sites.

The Navy response indicated that issue regarding the disposition of underground storage tanks and piping would be included in the Final RI or that the issue would be further investigated as part of any site remediation activities. No additional information has been provided in the Final RI, nor has any recommendation for further investigation of the issue been included in Section 1 or Section 8.0 of the Final RI. Please revise Section 8.0 to include this recommendation for further evaluation.

2. p. 2-17, §2.2.4.2 A 4-inch clay pipe containing approximately 1 inch of a black oily sludge material was observed at the ends of test pit samples TP-1A and TP-1C at a depth of 4 feet. As part of the Phase II Investigation, a sample of the sludge was collected for analysis and the clay pipe was plugged using absorbent pads, prior to backfilling TP-1. Analytical results from the oily sludge sample exhibited elevated concentrations of total PAHs (156,900 ppb) and bis(2-ethylhexyl)phthalate (12,000 ppb). To ensure that the sludge material observed in TP-1 has not leached from the absorbent pads into the underlying soils and groundwater it is recommended that an additional subsurface soil sample be collected in the vicinity of TP-1 at a depth just underlying the pipe. Additionally, it is recommended that further evaluation of the historical use and layout of the clay pipe be conducted as well as an evaluation of the possibility of pipe materials leaching into the underlying subsurface.

The Navy response indicated that additional sampling and investigation of soils adjacent to the clay pipe, including the black oily sludge sampled in TP-1A would be conducted as part of an FS or site remediation. However, this additional investigation is not presented in Section 8.0 of the Final RI. Please revise Section 8.0 to include this recommendation for further evaluation.

3 p. 2-25 §2.3.2.1

The excavation of test pit TP-4 was reportedly halted due to the presence of a potentially asbestos-containing material. The text should discuss the actions which were taken to verify the composition of this material (i.e. sampling) and should discuss the disposition of the material. Also, the report does not specify whether the black oily sludge observed in the clay pipe located adjacent to TP-1 was observed in the clay pipe encountered during the excavation of test pit TP-12. If the oily sludge material was observed in the clay pipe adjacent to TP-12, the text should include what actions were followed to contain the substance and if the material was analyzed.

The Navy response indicated that the report would be revised to discuss the actions taken during excavation of TP-4 with regard to the potentially asbestos-containing material. This information was provided in the Final RI. However, the report does not indicate whether any sampling was done to verify the composition or disposition of the potentially asbestos-containing material. If this characterization is to be done as part of an FS, then the recommendation for additional investigation should be in Section 8.0 of the Final RI.

The Navy also indicated that the report would be revised to discuss observations and actions during the excavation of TP-12 with regard to the black oily sludge. However, the revised discussion indicates that the black oily sludge was never analyzed due to an error at the laboratory. If this characterization is to be completed as part of an FS, then the recommendation for additional investigation should be in Section 8.0 of the Final RI.

20. p. 6-23, §6.4.9

This section indicates that the screening and toxicity values for naphthalene were used as a surrogate for acenaphthylene, benzo(g,h,i)perylene and phenanthrene. However, the screening tables do not use the naphthalene screening value as a surrogate for these compounds. Please correct this discrepancy in all screening tables.

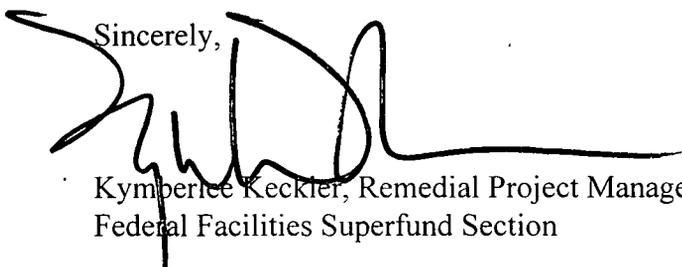
The Navy response indicated that the screening tables would be changed to correct the above discrepancy. However, only the screening value for phenanthrene has been corrected in Table 6-2.1. The screening values for acenaphthylene and benzo(g,h,i)perylene are still incorrect in Table 6-2.1. The error does not impact the result of the screening process, however it should be

corrected or the error should be noted in an errata sheet. All other screening tables have been corrected.

Please revise Table 6-1 to be consistent with the text (first paragraph of Section 6.3.3 - Exposure Estimates). From the text, it was stated that Table 6-1 presents a summary of exposure pathways for six media, including surface soil, subsurface soil, sediment, lobsters, clams, and blue mussels. However, Table 6-1 only presents exposure pathways for surface soil and sediment. Please include information for subsurface soil, lobsters, clams and blue mussels in Table 6-1.

I look forward to working with you and the Rhode Island Department of Environmental Management toward the cleanup of the Old Fire Fighter Training Area. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. Keckler', with a long horizontal flourish extending to the right.

Kymerlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

cc: Paul Kulpa, RIDEM, Providence, RI
Melissa Griffin, NETC, Newport, RI
Jennifer Stump, Gannet Fleming, Harrisburg, PA
Mary Philcox, URI, Portsmouth, RI
David Egan, TAG recipient, East Greenwich, RI