



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

N62661 AR 001475
NAVSTA NEWPORT RI
5090 3a

November 5, 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

*per meeting at NEWPORT on 11/15/01
EPA K. Keckler states that
there is no need to finalize
W.P. Sampling is complete*

Re: Draft Sediment Pre-Design Investigation Work Plan for Old Fire Fighting Training Area,
Naval Station Newport, Newport, RI

Dear Mr. Shafer:

I am writing in response to your request for EPA to review the *Draft Sediment Predesign Investigation Work Pan for Old Fire Fighting Training Area, Naval Station Newport, Newport, Rhode Island* dated October 2001. Detailed comments are provided in Attachment A.

The purpose of the proposed pre-design work is twofold: 1) to evaluate the extent of contamination in the eelgrass beds to better define the need for remediation in these areas, and 2) to provide additional data points to better define the volume of contaminated sediment requiring remediation. It does not appear that an adequate investigation of the eelgrass beds will be completed with the work plan as proposed. Also, further refinement of the sediment sampling locations outside the eelgrass beds using existing data as a focus is suggested.

The proposed sampling locations do not appear to be placed in the most appropriate areas for refining the extent of contamination at the site. A primary purpose of the pre-design investigation is to better evaluate contamination in and around the eelgrass beds (and to some extent the shellfish beds). Therefore, a greater number of samples should be collected from the eelgrass beds to better differentiate eelgrass areas possibly requiring remediation from areas that can be left in place.

It would be more appropriate, for areas outside the eelgrass beds, to establish a step-out sampling grid using locations known to have contamination exceeding PRGs as the focus. This would more logically establish the extent of areas of contamination than an arbitrary sampling grid laid over the entire site. Please reconsider the sample location strategy to make better use of existing data.

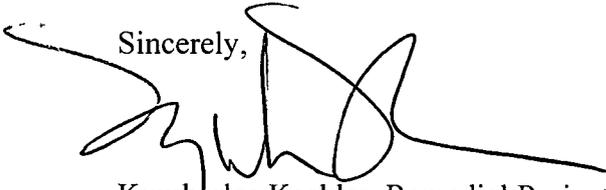
I recommend twelve sample locations in the main eelgrass bed, two sample locations in the sparse area contiguous to the main bed, and two sample locations in the isolated sparse bed. Outside the eelgrass beds, I recommend one sample location in NW area 2, five sample locations

in area 3, three sample locations in area 4, seven sample locations in area 5, five sample locations in area 6, and two sample locations in area 7. Additional sampling locations offshore of the shaded areas should be considered, especially station OFF-18 which exceeds one draft PRG.

To maintain the number of samples collected to correspond to that proposed in the work plan, I suggest that samples be collected from only two intervals at each alternative location: 0-0.5 ft and 1.5-2.0 ft. If both are clean, it is unlikely there will be contamination between them. If both are contaminated, contamination throughout to at least 2.0 ft can be assumed. If only the top one is contaminated, the FS can assume contamination to 1.0 ft and confirmation sampling following excavation can be used to find any deeper contamination, if any exists.

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

Sincerely,



Kymberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: Paul Kulpa, RIDEM, Providence, RI
Melissa Griffin, NETC, Newport, RI
Cornell Rosiu, USEPA, Boston, MA
Jennifer Stump, Gannet Fleming, Harrisburg, PA
Ken Finkelstein, NOAA, Boston, MA
Steven Parker, Tetra Tech-NUS, Wilmington, MA
Mary Philcox, URI, Portsmouth, RI
David Egan, TAG recipient, East Greenwich, RI

ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. 1-2, §1.0	There appears to be text missing before the text on this page. Please review and correct as appropriate.
p. 2-5, §2.1.1	The second sentence in the last paragraph on this page states that the offshore limits of the eelgrass beds extends outside the study area to the east and the west. Please clarify whether the statements intent is that the limits of the eelgrass beds could not be defined if they extended beyond the area studied in the Coasters Harbor Eelgrass Survey dated August 10, 2001.
p. 2-10, §2.5.3	The draft PRGs presented in this section need to be checked and corrected. The draft PRG for Indeno(1,2,3-cd) pyrene should be 4266 ug/kg. Also, the ecological based draft PRG for benzo(a) pyrene is 2929 ug/kg. The human health recreational PRG is presented in the pre-design document.
p. 2-10, §2.5.1	Please add another bullet to the list of items to be addressed by the pre-design study. Add “assess the range of concentrations of contaminants within the eelgrass and shellfish beds.” It is not definite that a slight or even moderate exceedance of PRGs would justify remedial action for these areas. An assessment of the benefit of remedial action versus the detrimental impact of eelgrass and shellfish bed destruction will be required. This will require an appropriate amount of reliable data. The first bullet on page 2-10 states “elevated risk offshore areas.” The ecological risk assessment did not identify high risk in the offshore. Only station OFF-05 at the approximate low tide line was identified as a high risk station.
p. 2-11, §2.5.6	The tolerance for false positives expressed in this work plan is not acceptable for sensitive environmental areas such as the eelgrass and shellfish beds. There should be a low tolerance for false positives in environmentally sensitive areas. Consequently, a relatively higher number of sample locations should be established in those areas to preclude the removal of sediment (and eelgrass beds) based on false positive detections.
p. 3-1, §3.0	The last paragraph states that an anchored buoy will mark each sample location and each location will be recorded using GPS. It is assumed that the GPS location will be determined or confirmed at the time of sampling because of the possibility that the anchored buoy could move. Please edit the text to more clearly reflect this.

p. 3-2, §3.2 A comparison of the detection limits for the proposed analysis to the PRGs should be provided in the document. Such an evaluation is necessary to ensure that the results will be usable.

p. 3-2, §3.2.1 In the first paragraph, the text states that an estimated twelve samples will be collected from locations within the eelgrass bed at 100-foot intervals as shown in Figure 3-1. However, a review of Figure 3-1 reveals that at most only three grid locations are within the eelgrass beds and, if only two intervals are sampled at each location (as the second paragraph in this section states), then twelve eelgrass bed samples will not be collected from grid locations. Please review and correct.

In the second paragraph, the text states that only two intervals within the top twelve inches of sediment will be sampled in the eelgrass bed locations. Please provide the rationale for not sampling the eelgrass beds to a depth of two feet, which seems more appropriate.

In the second paragraph, edit the text to confirm that upon arrival at each buoy and before sample collection, the GPS location will be confirmed. This will be necessary to confirm that the previously-placed buoy has not moved from its original location.

In the fourth paragraph, the text states the core will be deposited in a stainless steel bowl after the acetate liner is cut. Since the core presumably contains two (or more) samples from different intervals, TtNUS will also have to separate the single core into separate bowls for mixing and sampling. Please clarify what is intended.

p. 3-5, Table 3-1 The terminology used in this table is not consistent with that used in Section 4 of the work plan. Section 4.1.2.3 identifies field blanks as samples of source water used in decontamination. Source blanks are not discussed in Section 4. In Table 3-1, the definition for source blanks is the same as the definition for field blanks used in Section 4. It is not clear what field (ambient) blanks are, unless they are also source blanks. Note that since there are two water sources used in decontamination, there should be 4 source blanks collected if one is collected for each sampling event (grid and supplemental samples). Please review this table relative to the Section 4 text and edit as appropriate to correct the apparent discrepancy.

Figure 3-1 The FS identified sampling station OFF-18 as a location that exceeds the sediment PRG for 2-methylnaphthalene. Station OFF-18 is not depicted on Figure 3-1. This station should be presented on Figure 3-1. Pre-design samples should be considered in the vicinity of station OFF-18.

p. 4-7, §4.5 The first sentence should refer to Table 3-2 for analytical parameters, not Table 3-1. (Note that the order of presentation of Tables 3-1 and 3-2 in the work plan has Table 3-2 presented before Table 3-1.) Also, please clarify how the detection limit requirements identified in Section 2.5.3 will be communicated to the analytical laboratory.

Appendix B Please edit the sampling log or the sampling procedures to include measurement of the water depth at each sample location and include a notation of the status of the tide at the time of sample collection. This data will be useful for the FS evaluation.