



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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October 4, 2002

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: Comment Response Summary for the Old Fire Fighting Training Area

Dear Mr. Shafer:

Thank you for your response to EPA's July 11, 2002 letter dated August 28, 2002. I am concerned that many of the issues raised by EPA in several of its comment letters on the FSs remain. Moreover, EPA received the final FS relatively soon after the August 28, 2002 was received, so it is clear that a mutually acceptable resolution has not yet been reached.

Where the responses refer to new information provided within the FS to address an EPA comment, EPA's comments will be included in its forthcoming comments on the September 2002 FS.

In the response to General Comment 1, the Navy indicates that it may not be desirable to remove portions of an ecosystem under stress from contamination until we can be certain that re-contamination will not "re-stress" the ecosystem. The Navy has not produced any credible evidence that re-contamination is likely in near-shore sediment following remediation. In fact, it is unclear what re-contamination source the Navy is referring to - onshore soils (where the Navy states in the draft Proposed Plan that such soils will be removed and on page 1-12 of the FS where the Navy states that pre-remedial migration of contaminants from soil to sediment is "not expected to be significant") or surrounding sediments. Based on the evidence produced to date, it seems most likely that PAH contamination in near-shore sediment resulted from firefighting activities and that such contamination has persisted for many years. The Navy has not presented any evidence to suggest either an increasing or decreasing trend in contaminant levels. On this basis, EPA believes that it is prudent to remediate near-shore sediments to concentrations protective of marine life and human health. The only exception would be the eelgrass beds, where EPA believes that damage from dredging may outweigh long-term benefits of removing the contaminant. Other areas of the near-shore are neither unique nor particularly sensitive to temporary disruption. These areas are inhabited with organisms that will re-colonize readily either by settling of planktonic larvae or migration.

EPA is inordinately concerned about the Navy's inadequate responses to the General Discussion, General Comment 2, and Specific Comment 36. Merely stating that the Navy's position remains unchanged does not address the important concerns raised within EPA's letters. It is critical that the Navy provide information regarding the issues outlined below. Otherwise, the Navy's claims - both in the FS and the draft Proposed Plan - regarding how each alternative meets the NCP criteria will remain unsubstantiated and unsupported by EPA. The major outstanding issues requiring additional information include the following:

- ▶ The enforceability and effectiveness of the no swimming zone,
- ▶ The enforceability and effectiveness of the fishing ban,
- ▶ Data to demonstrate a clear and meaningful trend of decreasing contaminant mass, concentration, or toxicity in sediments over time
- ▶ The time required for sediments to reach PRGs via natural processes,
- ▶ Historical information concerning the frequency and severity of disruptive events and human-caused disturbances,
- ▶ Data that directly demonstrate the occurrence of a particular attenuating process at the site and its ability to degrade the contaminants of concern,
- ▶ Sediment bed stability, and
- ▶ Consistency with EPA regulations and guidance

With respect to GC8, June 30, 2002 was a Sunday. EPA assumes the Navy meant to refer to the May 30, 2002 meeting where the least environmentally practicable alternative was discussed in an effort to identify alternatives that minimize damage to eelgrass. Dioxin issues were not discussed at the May 30, 2002 meeting. The Navy's own meeting minutes reflect this. EPA has, however, reviewed the September 2002 Feasibility Study where additional dioxin assessments were presented. EPA's comments on this new work will be presented in our comments on the September 2002 Feasibility Study.

Regarding SC4 and SC15, the Environmental Land Use Restrictions, while presented in the FS as part of the remedy, were not presented in the Proposed Plan (page 2). EPA will comment on the ELURs further in our comments on the September 2002 Feasibility Study and the Proposed Plan.

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 Superfund site. Please contact me at (617) 918-1385 to arrange a meeting.

Sincerely,



Kimberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

cc: Paul Kulpa, RIDEM, Providence, RI
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