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RIDEM COMMENTS ON
DRAFT PROPOSED PLAN
OFFTA SITE

October 7, 2002

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: Old Fire Fighter Training Area Draft Proposed Plan, Naval Station Newport, Newport, Rhode Island

Dear Mr. Shafer,

The Rhode Island Department of Environmental Management, Office of Waste Management (RIDEM) has reviewed the Draft Proposed Plan for the Old Fire Fighter Training Area, dated 6 September 2002. Attached are comments generated as a result of this review.

In general, the Office of Waste Management concurs with the proposed onshore remedy, removal of contaminated onsite soils. The Office of Waste Management does not concur with the proposed off shore remedy, monitoring of the contaminated sediments.

The studies generated to date have demonstrated that the sediments represent an unacceptable ecological and human health risk. The proposed monitoring and access restrictions plans will not address this risk. Further, the Navy's report has indicated that onsite groundwater is not impacting the adjacent sediments. This brings into question the rationale for the proposed monitoring program. That is, if the onshore groundwater is currently not impacting the sediments, how will the onshore source removal result in a reduction in the concentrations of contaminants in the sediments?

Finally, performing the dredging action after the source removal, as was done at the McAllister Point Landfill, presented logistical problems which complicated this action, resulting in increased overall cost and necessitated the leaving of contaminated sediments in place. Conversely, the limited dredging which was performed at the Melville North Landfill was facilitated by the fact that this action was performed at the same time as the source removal. In addition, removal of the off shore source negated the need for a long term monitoring program in sediments

In conclusion, in light of the above considerations and other concerns previously submitted to the Navy the Proposed Plan should be modified to call for both onshore and off shore source removal. If the Navy has any questions concerning the above, please contact this Office at 401-222-2797, ext. 7111.

Sincerely,

Paul Kulpa
Office of Waste Management

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

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**Comments on the
Draft Proposed Plan
For
Soil and Marine Sediments
Old Fire Fighter Training Area**

**1 Page 2, Section 1, Excavate contaminated soils and debris
Paragraph 1.**

“Some metals are also present in the soil which exceeds state criteria for residential property.”

Please modify the above as follows:

Some metals are also present in the soil that exceeds state criteria for residential property and recreational use.

**2 Page 2, Section 1, Excavate contaminated soils and debris
Paragraph 2.**

“Approximately 58,000 cubic yards of material (approximately 5 acres) will have to be excavated.”

The above contains a typographical error please modify as follows:

Approximately 48,000 cubic yards of material (approximately 5 acres) will have to be excavated

**3 Page 2, Monitor Groundwater to assures contaminant concentrations decrease
Paragraph 1.**

Free product has been observed on the water table. This should be noted in this section of the report.

**4 Page 2, Monitor Groundwater to assures contaminant concentrations decrease
Paragraph 1.**

“Although concentrations of these contaminants are unacceptable for a drinking water source, this is an implausible use of the water taken from the site because the water is brackish and saline.”

Please remove this sentence from the plan, as the water at the site is neither brackish nor saline.

**5 Page 2, Off Shore Areas
Paragraph 1.**

This section of the plan should note that consumption of shellfish represents an unacceptable risk.

**6 Page 2, Off Shore Areas
Paragraph 3.**

This section of the report states that the site will be evaluated after five years to determine whether removal of the source has reduced contaminant concentrations. The Feasibility Study for the site states that groundwater is not impacting the sediments adjacent to the site. The Proposed Plan should state how the site is impacting the sediments.

**7 Page 2, Off Shore Areas
Paragraph 3.**

This section of the plan states that the site will be evaluated after five years to determine whether removal of the source has reduced contaminant concentrations. However, the plan also notes that conditions at the site are dynamic in that contaminants are being moved in and out. Considering this site-specific factor and the heterogeneous nature of sediment sampling, the Navy should explain how it would be possible to observe trends and distinguish them from observed dynamic nature of the site.

**8 Page 2, Off Shore Areas
Paragraph 3.**

This section of the plan states that the site will be evaluated after five years to determine whether removal of the source has reduced contaminant concentrations. However, the Navy has not stated what level of reduction is anticipated in five years. The Proposed Plan should state what level of reduction is anticipated in five years.

**9 Page 2, Off Shore Areas
Paragraph 3.**

The Navy has stated that the adjacent sediments may be removed after the remediation is completed on the onshore portion of the site. As the Navy is aware removal of the contaminated sediments adjacent to the McAllister Point Landfill site after completion of the onshore remedial activities greatly complicated and increased the cost of the offshore dredging. Conversely, the offshore removal action at the Melville North was facilitated by the fact that it was done concurrently with the onshore removal action. Further, the Navy has stated that onsite groundwater is not contaminated the sediments adjacent to the site and has not offer a mechanism to explain the observed contaminate distribution in the sediments. Accordingly, the State recommends that both actions be performed at the same time.

**10 Page 5, Why is the Cleanup Needed
Bullet 1.**

“Residential use of the property would exceed state risk criteria for people who contact the soils through regular gardening, digging and lawn care.”

It is inappropriate to state or imply that the States residential use is limited to regular gardening, digging and lawn care. Therefore, the above should be modified as follows:
The concentrations of contaminants at the site exceed the States residential and recreational criteria.

**11 Page 5, Why is the Cleanup Needed
Bullet 2.**

The onsite soils and the beach exceed the State’s recreational standard. Please eliminate the second bullet and simply state that the site and the beach exceed the State’s recreational standard.

**12 Page 5, Why is the Cleanup Needed
Bullet 3.**

“, nor could exist due to the size and nature of the effected area.”

No study has been performed concerning the yield of the affected area. Therefore, it is inappropriate to state that this activity could not occur due to the size and nature of the effected area. Please remove this statement from the Proposed Plan.

**13 Page 5, Why is the Cleanup Needed
Bullet 3.**

“Contaminants may pose a risk to people who habitually eating shellfish collected from the site (40 meals per year).”

The Navy has underestimated the shellfish consumption rate. Therefore, please modify the above as follows:

Contaminants may pose a risk to people who habitually eating shellfish collected from the site

**14 Page 5, Onshore (Above High Tide),
Bullet 5.**

“The possibility of health effects from contaminants in soil exceeds state and federal acceptable levels for people who use the site for residential purposes.”

Please modify the above as follows:

The possibility of health effects from contaminants in soil that exceeds state and federal acceptable levels for people who use the site for residential purposes and state acceptable levels for people who use the site for recreational purposes.

**16 Page 5, Onshore (Above High Tide),
Bullet 6.**

“However use of the water for such a source is not plausible in the foreseeable future.”

The water is neither brackish nor saline therefore the above should be modified as follows:
However use of the water for such a source is not expected in the foreseeable future

17 Page 5, Site History,

Please add the following information to this section of the Proposed Plan

1983: Navy completes Initial Assessment Study of the Newport Navy Base. Study recommends no further action at the site and concludes that any oil at the site is no longer present and the site does not pose a risk to human health and the environment.

1989: Oil contaminated soils are uncovered in an excavation associated with construction related activities at the site.

1991: Study Phase I Remedial Investigation is completed. Study documents that contamination is present and recommends additional investigations to further delineate the extent of contamination.

1994: Study Phase II Remedial Investigation is completed. Study further delineates extent of contamination.

18 Page 5, Site History,

“for residential property or for intensive recreation along the shoreline”

Please modify the above as follows:

for residential property and recreational use or for intensive recreation along the shoreline

19 Page 7, Soil and Groundwater,

“unacceptable risk to persons using the property for residential purposes”

unacceptable risk to persons using the property for residential purposes or recreational purposes under the State’s standards

20 Page 7, Soil and Groundwater,

“Additionally, the water is unsuitable for general supply because it is brackish and saline, due to the proximity of the ocean.”

The water at the site is neither brackish nor saline. Therefore, this sentence should be removed from the Proposed Plan.

21 Page 7, Marine Sediment,

This section of the Plan discusses intermediate and high-risk stations at the OFFTA site. The State has not accepted the Ecological Risk Assessment Report or the high, intermediate and low risk stations designations. Therefore, please remove these statements and simply state that the stations represent unacceptable risk.

22 Page 7, Marine Sediment,

“Additionally, it was concluded that people who habitually eat lobsters and shellfish from Coasters Harbor (40 meals per year or more taken from this area) may have a risk of health effects.”

The Navy has underestimated the consumption rate of shellfish and lobster. Therefore, please modify the above as follows:

Additionally, it was concluded that people who habitually eat lobsters and shellfish from Coasters Harbor may have a risk of health effects

24 Page 7, Marine Sediment,

“However, no such regular consumption currently exist, nor could exist due to the size and nature of the affected area.”

The Navy has not performed any studies concerning the potential yield of shellfish from this area. Therefore, please remove this statement from the Plan.

**25 Page 8, Soil Alternatives,
Last Paragraph.**

This paragraph states that Alternative 3 is the preferred alternative since it allows for unrestricted use of the site. Alternative 2 meets this same objective. Therefore, the Navy should provide additional rationale in support of Alternative 3.

**26 Page 8, Groundwater Alternative,
Alternative 2: Limited Action**

“Establish an Environmental Land Use Control agreement, attached to title or property deed that restricts use of the groundwater...”

In the past it has been stated that it is not possible for the Navy to place ELURs controls on their property. Please explain how this can now be accomplished. In addition, please note whether this has been done at any other active military base.

**27 Page 8, Groundwater Alternative,
Last Paragraph.**

“Remediation of the groundwater is evaluated as a matter of course.”

Groundwater classified GB shall not represent a threat to human health and the environment. In addition it should not adversely affect any surface water bodies. Therefore, it is inappropriate to state that groundwater will be addressed as a matter of course and the above should be modified as follows:

Groundwater will be addressed to insure that it does not represent a threat to human health and the environment.

**28 Page 8, Groundwater Alternative,
Last Paragraph.**

“The water at the site will not be used for water supply, because of the state designation, the salinity of the water at the site...”

The statute states that groundwater classified GB is assumed to be unsuitable for drinking water without treatment. In addition, the groundwater classification at the site does not prohibit its use for domestic purposes. In this State there are private wells in GB aquifers. Therefore it is inappropriate to state that the groundwater cannot be used as a public water supply due to the state designation. Please remove this statement from the report.

**29 Page 8, Groundwater Alternative,
Last Paragraph.**

“The water at the site will not be used for water supply, because the salinity of the water at the site...”

The water at the site is neither saline nor brackish. Please remove this statement from the report.

**30 Comparison of Soil Alternatives,
Comparison of Sediment Alternatives.**

As stated in comments on the Feasibility Study the Navy cost estimates for the soil removal at Old Fire Fighter Training Area are excessive compared to similar actions conducted at other sites including the removal action conducted at Melville North Landfill. The cost estimates for the removal of contaminated sediments are also excessive. Further the estimates are essentially the same as those for the McAllister Point Landfill site. At the McAllister Point Landfill site the Navy is currently drafting an Explanation of Significant Difference to document that the cost estimates were excessive. The Office of Waste Management is aware that budgetary considerations may warrant the use of these inflated values. However, the projected cost of performing the dredging action at the site has been used as an argument for not performing this action. Therefore, The Office Of waste Management does not accept the cost estimate in the Feasibility Study or in the Proposed Plan. These estimates should be modified to reflect more realistic projections of the cost.