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November 4, 2002

Project Number N4152

62579

Mr. James Shafer
Remedial Project Manager
EFA Northeast, Naval Facilities Engineering Command
10 Industrial Highway, Mail Stop 82
Lester, Pennsylvania 19113

Reference: CLEAN Contract No. N62472-90-D-1298
Contract Task Order No. 0833

Subject: Response to Comments, Draft Proposed Plan
Old Firefighting Training Area (OFFTA)
Naval Station Newport, Newport Rhode Island

Dear Mr. Shafer:

Attached you will find responses to comments to the Draft Proposed Remedial Action Plan (PRAP) for the OFFTA site. Comments were received from RIDEM and EPA October 7, and 8, 2002 respectively.

The responses acknowledge agreement between the regulators and the Navy on the preferred approach for the soil and groundwater at the site, and the differences in the preferred approaches for the marine sediment. It is our understanding that a meeting will be held later this month to resolve these differences so that we can move forward with the proposed plan, public meeting, and ROD.

If you have any questions regarding this material, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Stephen S. Parker', written over a horizontal line.

Stephen S. Parker
Project Manager

SSP/rp

Enclosure

- c: M. Griffin, NSN (2 w/encl.)
- M. Imbriglio, NSN (7 w/encl.)
- P. Kulpa, RIDEM (4 w/encl.)
- K. Keckler, USEPA (4 w/encl.)
- K. Finkelstein, NOAA (2 w/encl.)
- J. Stump, Gannet Flemming (2 w/encl.)
- J. Trepanowski/G. Glenn, TtNUS (w/encl.)
- File N4152-3.2 w/o encl., N4152-8.0 (w/encl.)

**ATTACHMENT A
COMMENTS PROVIDED BY THE USEPA
OCTOBER 8, 2002
OFFTA DRAFT PROPOSED PLAN**

62578

**Comment #/
Page**

Comment

1.

p. 1, left box

EPA disagrees that the Navy has proposed "...a plan to reduce risk from soil, groundwater and sediment...."

The groundwater component of the remedy should include Environmental Land Use restrictions (ELURs).

The proposed remedy for the Offshore area is not protective of human health and the environment and is therefore not supported by EPA. Many outstanding issues remain unresolved. These issues include: 1) the enforceability and effectiveness of the no swimming zone; 2) the enforceability and effectiveness of the fishing ban; 3) data to demonstrate a clear and meaningful trend of decreasing contaminant mass, concentration, or toxicity in sediments over time; 4) the time required for sediments to reach PRGs via natural processes; 5) historical information concerning the frequency and severity of disruptive events and human-caused disturbances; 6) data that directly demonstrate the occurrence of a particular attenuating process at the site and its ability to degrade the contaminants of concern; 7) sediment bed stability; and 8) consistency with EPA regulations and guidance.

Response:

The Navy concurs with the addition of ELURs to the groundwater component.

The Navy has carefully considered EPA's position on the protectiveness of the proposed remedies. However, the Navy believes that the proposed fencing actions will reduce risk to human health by reducing possibility for exposure. Additionally, only one station exhibited a high potential for risk to the ecological receptors, and that station was located adjacent to a primary storm water outfall. This indicates that there is too much uncertainty associated with the source of PAH contamination and the role of current contaminant inputs to the marine sediment at the shoreline of the site. The Navy therefore believes that completion of the on shore remedial actions and changes to the storm water drainage system is wise before undertaking an extensive remedial action in the marine environment.

2. p. 1, right
column

The reference to page 6 is not correct.

Response:

The typographical error will be corrected.

3. p. 2, #1, ¶2

The FS stated that 48,500 cubic yards of soil and debris will be excavated and disposed. Change 58,000 cubic yards in the proposed plan to be consistent with the FS.

Response:

The volumes will be checked and corrected as appropriate.

4 p. 2

Under Off-Shore Areas, please add "and some metals" after "Marine sediment in Coasters Harbor was found to contain PAH compounds."

Response

The Navy concurs, the metals notation will be added.

5. p. 2, #2 *The proposed remedy for the groundwater should include ELURs. Without ELURs, the remedy is not protective of human health and is not consistent with the Feasibility Study. ELURs must be instituted to prevent ingestion of groundwater that exceeds MCLs, restrict excavation which exposes groundwater, and also use of the groundwater for irrigation or any other purpose.*

Determining when contaminant concentrations may be below target levels should be determined in the FS (as it is - up to 676 years) and is not a component of the remedy.

Under the last bullet change "conditions every 5 years" to "conditions at least every 5 years."

Response: The Navy concurs with the comments above and these revisions will be made as appropriate.

6. p. 2 *Under Off-Shore Areas, monitoring sediment "...to evaluate changing conditions..." is not protective of the marine environment. EPA therefore objects to the Navy's proposed sediment alternative as currently presented. EPA believes that sufficient information is available for a final remedy at this site that addresses the sediment contamination risks to human health and the environment. Therefore, the Agency does not believe that an "interim action" is sufficiently protective under CERCLA requirements.*

In the first bullet, a "rail-style fence" is insufficient to prevent human access to beach, particularly if the upland portion of the site is redeveloped for recreational purposes. It is important to note that in the Navy's earlier evaluations, a chain link fence was determined to be insufficient to keep the public off of the upland portion of the site, so reducing the level of fencing should not be considered an option for keeping people off of the beach.

In the last sentence, it is unclear what EPA policies that the proposed interim action complies with. Please specify. EPA assumes that the Navy is familiar with the federal laws that the proposed remedy does not comply with given their long-term experience with investigation and cleanup as a responsible party at numerous Superfund sites.

Response: The Navy believes that based on the distribution of elevated concentrations of PAHs and the location of the single high risk station near the storm water outfall, there is enough uncertainty to warrant completion of the on shore removal action and a period of monitoring. Then evaluation of that monitoring information will show what the effects of that action are on the sediment prior to undertaking a large scale removal action in the marine environment. Under Navy policy, cleanup of the offshore areas is not encouraged until on shore removal actions are completed.

With regards to the fencing as a risk reduction measure, the Navy concurs that the fence will not completely eliminate the risk of exposure, but will reduce exposure through restricting access.

7. p. 2 *The second paragraph of the Offshore Areas Section states that sediment sampling data over five years have shown that sediment conditions are dynamic and that contaminants may be swept in and out with fine grain sediments. Please explain exactly what data have been presented to date to support this statement and provide a copy of such data to EPA. It seems more likely that the PAH contamination is stable, considering that it is still located near shore.*

This section also states that removing soil would reduce contamination in sediment. As noted in our comments on the September 2002 FS, the Navy has made contradictory statements regarding the likelihood that soil on-site is an ongoing source of contamination

to near-shore sediment. There has been no convincing case made to support the hypothesis that removing contaminated soil on-site would result in lower PAH concentrations in near shore sediment.

Response: The Phase 2 Predesign investigation report states that elevated PAH concentrations were detected in August 2002 approximately 50 feet from the location where they were detected in November 2001. A more quantitative discussion on stability and dynamics may be appropriate in the technical groups, however, it is more appropriate to simplify these matters in the PRAP.

The Navy has admittedly had difficulty resolving the source of contaminants at the shoreline. At earlier stages of the investigations, these contaminants were presumed to be a result of overland discharges from fire training exercises. While the Navy understands it is still EPA's belief that the PAHs are present in the sediment as a result of ash and oil discharged to the shoreline during fire training exercises conducted between the 1940s and 1970s, two other contributions must be considered. One is a contribution provided from upgradient parking areas by the storm drain system, which the Phase 2 Predesign Investigation clearly identifies. The other is the bedding material of this same storm drain culvert acting as a preferential pathway to contaminants in the soil and groundwater. While the groundwater evaluations show that groundwater moving through the formations tested are unlikely to impact sediment, the formation around the storm drain is likely to not match the behavior of the surrounding soils. It is known that there are pockets of non-aqueous phase oils in the groundwater near the storm drain, and these may travel with this bedding material under certain conditions and periodically contribute to the PAH contaminants in the sediment.

As discussed previously, a storm water discharge upgrade is anticipated for this area of Coasters Harbor Island for July 2003. This upgrade will include the installation of a vortex type sediment capture system, which will assist to reduce PAH contaminant concentrations in discharges from this drain system. Additionally, the Navy is looking into redistributing the drainage from this area to other storm drain outfalls so that the system is more balanced.

It is the Navy's opinion that by removing the on-site contamination, redistributing the storm drainage from upgradient areas, reducing PAH discharge through the storm water drain upgrades, and monitoring the marine sediment for a period of time, a more thorough understanding of the source of the contaminants in the marine sediment will be gained. After a period of monitoring, any necessary removal actions can be properly targeted, and there will be less risk of recontamination from non-site specific sources.

8. p. 5 *In the first set of bullets in the first column, please add a bullet identifying the risk from groundwater from drinking or contact.*

In the sentence after the first set of bullets identify the metals of concern, rather than saying "a few metals." At the bottom of the left column, please add a bullet to identify the human health risks from ingestion of contaminated seafood.

Response: The Navy concurs with the suggested modifications, and some discussion will be presented to describe arsenic as the risk driver for shellfish ingestion as well as the uncertainty of the toxicity associated with it.

9. p. 6 *In the first column, please note the EPA does not concur that the Navy has chosen a plan that meets the NCP criteria.*

Response: It is the Navy's hope that the plan can be agreed to prior to submittal to the public. If the Final PRAP is released prior to a resolution on the protectiveness and other issues, the EPA's position will be made clear in the PRAP.

10. p. 7 *The cleanup objectives and levels are not consistent with the FS. Please revise.*

Earlier studies identified health risks in scenarios in addition to the residential scenario. These scenarios where unacceptable risks were determined include: 1) Child care; 2) Commercial/Industrial; 3) Future Commercial/Industrial; and 4) Future Day Care. Please add these scenarios to ensure consistency within the administrative record.

In the second bullet under Soil and Groundwater, please remove the asterisk. Since the State of Rhode Island does not have an approved Comprehensive State Groundwater Protection Program, institutional controls will be required as part of the Superfund remedy to ensure appropriate restrictions on groundwater use. Since groundwater restrictions will need to be implemented, the text of the third bullet needs to be changed to reflect the need for long-term institutional controls on groundwater use and excavation that would expose groundwater.

Under Marine Sediment in the second paragraph, please provide a reference for stating that "...no such regular consumption currently exists..." or delete this statement. As you know, there are differing technical opinions on this point.

Response: The risks, cleanup objectives and levels will be reviewed for consistency with the FS. The revision regarding groundwater will be included as suggested. The passage regarding shellfish consumption will be revised to correctly state that "...no such regular consumption is known to exist...".

11. p. 7 *The stated Marine Sediment Clean-up Objectives include reducing exposure of aquatic organisms to sediment containing contaminants exceeding the clean-up levels, yet the proposed remedy does not reduce such exposures. There is no evidence to support achievement of this objective either in the near-term or the long-term.*

Response: The Navy's preferred interim action may not be the final resolution for the marine sediment. The reviewer is referred to the response to comment no. 7.

12. p. 7 *Under Marine Sediment cleanup objectives, change "Reduce exposure..." to "Prevent exposure...."*

Based on the baseline risk assessment, please add two bullets for two more cleanup objectives that EPA has identified:

- *Prevent human ingestion of shellfish affected by the sediment contaminant concentrations exceeding the PRGs.*
- *Minimize migration of contaminated sediments exceeding PRGs to off-shore areas and previously unaffected areas of the Narragansett Bay.*

Response: The Navy does not presume to be able to wholly prevent exposure, even if a removal program was undertaken. Any selected alternative should be selected to reduce exposure and thus reduce risk to acceptable levels.

The two suggested bullet items above have been reviewed for consistency with the FS. While the objective for shellfish ingestion is stated in the FS, it is also discounted due to the distribution of the data, uncertainty of toxicity and uncertainty of the exposure

pathway. Minimization of contaminant migration to offshore areas is not an RAO in the final FS. Additional work on determining background conditions similar to that underway by the NRL would be appropriate prior to undertaking this as an RAO.

13. p. 8, left Third bullet of Alternative 2: change to "...with a low temperature thermal column stripping system..."

Response: The Navy concurs and this revision will be made.

14. p. 8, right Alternative 3: please add two bullets for "Discharge of treated water to the POTW" column and "Groundwater monitoring" to be consistent with the FS.

Response: The Navy concurs and this revision will be made.

15.p. 8 In the right column in the first bullet of Alternative 2 at the end "or for any other purpose. Direct contact with groundwater will also be restricted."

In the bottom of the right column, please remove the last paragraph in bold. Since the State of Rhode Island does not have an approved Comprehensive State Groundwater Protection Program, institutional controls will be required as part of the Superfund remedy to ensure appropriate restrictions on groundwater use.

Response: The Navy concurs, and the revisions will be made within the context of the PRAP.

16. p. 9 Alternative 3, first bullet: please add "Excavate intertidal sediments (5,716 cubic yards) that pose....."

Alternatives 4 and 5, first bullet, please add "Dredge intertidal (5,716 cubic yards) and subtidal sediment...."

"Alt 4 - Avoid dredging in eelgrass beds (214 cubic yards, resulting in total of 5,930 cubic yards of contaminated sediment)"

"Alt 5 - Remove all contaminants, including those in eelgrass (290 cubic yards, resulting in total of 6,006 cubic yards of contaminated sediment)."

Change last bullet to be consistent with the FS as follows:

"Monitor site restoration (Alt 4) plus assist restoration of benthic community and natural restoration of eelgrass beds (Alt 5)."

Add one bullet for "Conduct 5-year reviews."

Response: The Navy concurs, and the revisions will be made.

17. p. 9 EPA disagrees with several of the Navy's "important notes" at the bottom of the page. Silt curtains were used effectively during the dredging offshore of the McAllister Point Landfill to protect the adjacent eelgrass bed from sediment resuspension impacts. There is no reason why the same mitigation measures could not be used at the OFFTA site as well. Removal of contaminated sediment and restoration is necessary for the health of the ecosystem adjacent to the site.

As stated by EPA in numerous comment letters, the Navy must provide information to justify 1) a clear and meaningful trend of decreasing contaminant mass, concentration, or toxicity in sediments over time; 2) the time required for sediments to reach PRGs via natural processes; 3) historical information concerning the frequency and severity of disruptive events and human-caused disturbances; 4) the occurrence of a particular

attenuating process at the site and its ability to degrade the contaminants of concern; and 5) sediment bed stability. Otherwise, this paragraph is utterly baseless and should be deleted.

The Navy's own studies document that the sediment contamination is from site-related activities. Delete this paragraph.

As has been communicated with the Navy on numerous occasions, EPA's position is that Alternative 4 is the most compliant with NCP standards and should be selected by the Navy.

The Navy is required to make findings and solicit public comment under federal wetlands and floodplain executive orders that its chosen alternative is the best practicable alternative for the protection of wetland and floodplain (including intertidal) resources. EPA's position is that removal of sediment under Alternative 4 is the most protective and practicable alternative.

Response: Regarding the protection of the eelgrass, data provided in the Phase 2 Predesign Investigation Report indicate that alternative 5 is no longer applicable (excavation within the eelgrass appears to no longer be required), and thus the Navy concurs with rewording this passage to reflect protection with silt curtains. Regarding the selection of the preferred alternative for sediment, the reviewer is requested to refer to the responses to comment nos. 1, 6, and 7.

18. p. 11, top box

The proposed remedy does not best meet CERCLA criteria and EPA strongly objects to this statement. Most notably, the sediment remedy is 1) not protective of human health and the environment, 2) does not meet ARARs, and 3) is not effective over the long-term. It is neither appropriate nor compliant with federal and state law to leave existing unacceptable risks to human health and the environment in place.

Response: The reviewer is requested to refer to the responses to comment nos. 1, 6, and 7.

19. p. 11, bottom box

EPA disagrees with the proposed sediment remedy. The Navy's proposed remedy will impact the local community and environment in several additional ways that were not listed. These include: 1) restriction on use of groundwater resources for drinking water and irrigation because of contaminant levels; 2) prohibitions on swimming and fishing in the offshore area; 3) leaving contamination on site and not acting in the best interest of the public trust; and 4) aesthetic impacts from the physical barriers.

Response: Items 1 and 2 above are also current restrictions, suggesting they are not impacts of the remedy. Item 4 is a matter of opinion and tastefulness of the final product. However, these three items shall be noted in the context of the PRAP. It will also be revised to reflect that contamination may be left temporarily, although it should be clear that if contaminants exceeding PRGs are found to remain after a period of monitoring, they would be removed under a later action. Whether the preferred action is in the best interest of the public trust is a matter of opinion. That opinion should be based on the plausible risk described in the risk assessment reports (a measured ecological exposure-response at one station, and a possibility for human risk based on exceptionally high use of the shoreline) as well as what one could hope to expect from the removal action in question.

20. Tables

Comparison of Groundwater Alternatives: Alternative 3 will meet federal and state standards and may be effective over the long-term. Therefore, change these criteria to "YES."

Please replace the Comparison of Sediment Tables with the one provided in Attachment B. EPA strongly disagrees with the Navy's assessment of how each alternative complies with the NCP criteria. Moreover, there is no basis for stating that Alternative 2 will achieve cleanup goals in 1 to 5 years.

Response: The Navy concurs with the revision suggested for the groundwater tables. Moreover, meeting standards through groundwater flushing is the same whether it is flushed by pumping or by natural processes. Therefore, Alternative 3 and Alternative 2 both will be changed to "Yes" for meeting state and federal standards. Alternative 3 long term effectiveness will be changed to "Yes".

Revisions to sediment tables are not consistent with the Navy's understanding of the source of contamination in the marine sediment, as described in responses to comments 1, 6 and 7, as well as prior correspondence on these issues.

**ATTACHMENT B
COMMENTS PROVIDED BY THE RIDEM
OCTOBER 7, 2002
OFFTA DRAFT PROPOSED PLAN**

General Comment:

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.

Response: The reviewer is reminded that the Navy's preferred action for the marine sediment is an interim action, allowing monitoring to be performed until the effect of the on shore actions are fully realized. If the on shore actions do not provide a reduction in contaminant load to below the PRGs, the Navy will undertake additional actions as appropriate.

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?

Response: The Navy has admittedly had difficulty resolving the source of contaminants to the shoreline. While the Navy understands it is DEM's belief that the PAHs are present in the sediment as a result of ash and oil discharged to the shoreline during fire training exercises conducted in the 40s and 50s, two other contributions must be considered. One is a contribution provided from upgradient parking areas by the storm drain system, which the Phase 2 Predesign Investigation clearly identifies. The other is the bedding material of this same storm drain culverts acting as preferential pathways. While the groundwater evaluations show that groundwater moving through the formations tested are unlikely to impact sediment, the formation around the storm drain is likely to not match the behavior of the surrounding soils. It is known that there are pockets of non-aqueous phase oils in the groundwater near the storm drain, and these may travel with this bedding material under certain conditions and periodically contribute to the sediment contamination.

It is the Navy's opinion that by removing the on-site contamination, redistributing the storm drainage from upgradient areas, and monitoring the marine sediment for a period of time, a more thorough understanding of the source of the contaminants in the marine sediment will be gained. After that interim action and monitoring program, any necessary removal actions can be properly targeted, with less risk of recontamination from non-site specific sources.

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

Response: The removal of subtidal sediment at the McAllister Point Landfill was complicated by the location and depth of the solid waste that was the target of the excavation. The material would have been difficult to access both with and without the onshore remedy in place. Access to the possible dredge area at the OFFTA site is not expected to be hindered by the completion of the on shore action.

Specific Comments:

**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.

Response: The Navy concurs, and the passage will be revised to state exceedance of state criteria in general. A separate text box will be developed to describe the basis for the state risk criteria. The state direct exposure criteria will be clarified as being protective of both residential and recreational uses.

**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

Response: The volumes will be checked and corrected as appropriate.

**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.

Response: The Navy concurs, and this will be included within the context of the descriptions.

**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.

Response: The reviewer is referred to the Phase 2 Predesign Investigation Report, which presents average salinity data for the groundwater at the site. Average salinity ranged from 0.03 ppt to 21.5 ppt, whereas seawater was measured at approximately 33 ppt. These conditions are considered brackish and saline.

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

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

Response: The Navy concurs that this should be better presented, however, within the parameters of the risk assessments that have been finalized. Such a presentation will include the uncertainties associated with the toxicity of arsenic in shellfish, since that is the risk driver in shellfish ingestion scenarios.

**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.

Response: The reviewer is asked to refer to the response to the second portion of the States general comment. This will be made more clear in the revised PRAP.

**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.

Response: Because of the dynamic conditions and the heterogeneity of sediment sampling, only through repeated sampling efforts can accurate trends be identified. For this reason, the Navy prefers to monitor to identify those trends.

**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.

Response: If the contaminants are not reduced to below PRGs, additional actions will be undertaken as appropriate. The Navy is revisiting the site again in October 2002 to continue evaluation of PAH concentrations in sediments at these locations. In general, a downward trend seems evident from the limited data sets that are available (RI, 2 Phases of PDI, and NRL data). However, additional re-sampling will be required to predict the decrease in contaminant concentrations, which is why no anticipated reduction is presented yet.

**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.

Response: The reviewer is asked to refer to the response to the last portion of the States general comment within this summary.

**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.*

Response: The Navy concurs, and the passage will be revised as appropriate for the context of the PRAP.

**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.

Response: As the PRAP is a public informational document, it is appropriate to include, as much as possible, the basis of the information provided. Simply stating that "a calculated risk is exceeded" is not informative. Therefore the Navy would prefer to leave the bullet and add the information requested in the comment above.

**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.

Response: The Navy concurs that the passage is a matter of opinion, and thus will be struck from the document.

**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

Response: As stated above, the basis of the calculated risk needs to be identified for clarity. Whether the consumption rate used in the risk assessment is accurate or not is immaterial to the statement, the risk calculated from the ingestion of shellfish at 40 meals per year is actionable, and the State would be remiss to disagree. Additionally, this information is absolutely critical to any member of the public who may actually have ever collected shellfish or lobsters at rates greater or less from this area. Leaving this point vague would not be informative to anyone, nor helpful to actual receptors.

**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.

Response: Modifications will be made in accordance with responses to comments 10 and 11, above.

**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*

Response: The reviewers is asked to refer to the response to comment 4, above.

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.

Response: The Navy concurs, and these events will be added as appropriate.

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

Response: The passage will be revised in accordance with comments 10 and 11 above.

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

Response: The passage will be revised in accordance with comments 10 and 11 above.

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.

Response: The reviewer is asked to refer to the response to comment 4, above.

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.

Response: The Navy understands RIDEMs position on the ecological risk assessment, however, the other parties involved, including the lead enforcement agency recognize the risk assessment and value the findings provided within it. Again, the basis for the risks should be stated where possible in order to be informative.

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 affects."

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 affects

Response: The reviewer is asked to refer to the response to comment 13, above.

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 form the Plan.

Response: The Navy concurs, and this passage will be revised.

**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 provided additional rationale in support of Alternative 3.

Response: The Navy concurs, and this section will be revised for consistency.

**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.

Response: The FS presents a description of the ELUR process for Navy-held property. The restriction is held within the NAVSTA base plan until the property is exsessed, and then an ELUR is provided on the new deed established for that exsessed parcel.

**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.

Response: The Navy concurs, and the passage will be revised within the context of the statement.

**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.

Response: The Navy concurs, and the passage will be revised.

**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.

Response: The reviewer is asked to refer to the response to comment 4.

**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.

Response: The Explanation of Significant Difference for McAllister (September 3, 2002) documents the conditions that required the estimates to be as high as they were, and the changing requirements that resulted in a reduction of cost. The estimates provided in the OFFTA FS are provided with similar restrictions and contingencies (many of which have been brought up by RIDEM and EPA) to allow a relative baseline comparison between alternatives. The Navy is obligated to provide to the public the total possible cost with these contingencies at this stage of the process.



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November 4, 2002

Project Number N4152

Mr. James Shafer
Remedial Project Manager
EFA Northeast, Naval Facilities Engineering Command
10 Industrial Highway, Mail Stop 82
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Reference: CLEAN Contract No. N62472-90-D-1298
Contract Task Order No. 0833

Subject: Response to Comments; Draft Proposed Plan
Old Firefighting Training Area (OFFTA)
Naval Station Newport, Newport Rhode Island

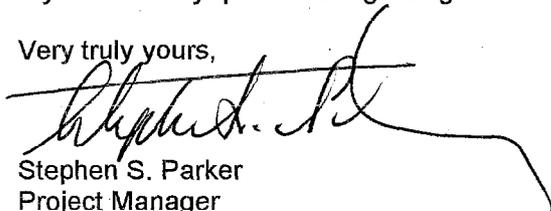
Dear Mr. Shafer:

Attached you will find responses to comments to the Draft Proposed Remedial Action Plan (PRAP) for the OFFTA site. Comments were received from RIDEM and EPA October 7, and 8, 2002 respectively.

The responses acknowledge agreement between the regulators and the Navy on the preferred approach for the soil and groundwater at the site, and the differences in the preferred approaches for the marine sediment. It is our understanding that a meeting will be held later this month to resolve these differences so that we can move forward with the proposed plan, public meeting, and ROD.

If you have any questions regarding this material, please do not hesitate to contact me.

Very truly yours,



Stephen S. Parker
Project Manager

SSP/rp

Enclosure

- c: M. Griffin, NSN (2 w/encl.)
- M. Imbriglio, NSN (7 w/encl.)
- P. Kulpa, RIDEM (4 w/encl.)
- K. Keckler, USEPA (4 w/encl.)
- K. Finkelstein, NOAA (2 w/encl.)
- J. Stump, Gannet Flemming (2 w/encl.)
- J. Trepanowski/G. Glenn, TtNUS (w/encl.)
- File N4152-3.2 w/o encl., N4152-8.0 (w/encl.)