



DEPARTMENT OF THE NAVY

ENGINEERING FIELD ACTIVITY, NORTHEAST
NAVAL FACILITIES ENGINEERING COMMAND
10 INDUSTRIAL HIGHWAY
MAIL STOP, #82
LESTER, PA 19113-2090

IN REPLY REFER TO

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EV23/JS
February 6, 2003

Mr. Donald F. Berger, Chief
Environmental Protection Agency, Region I
1 Congress Street, Suite 1100
Boston, MA 02114-2023

Dear Mr. Berger:

SUBJECT: OLD FIRE FIGHTING TRAINING AREA AT THE NAVAL STATION,
NEWPORT, RI

The Navy has received your letter of December 19, 2002 which describes concerns over the Navy's proposed cleanup plans for the Old Fire Fighting Training Area (OFFTA) at Newport Rhode Island. All of these issues were discussed during the meeting of November 21, 2002 at Rhode Island Department of Environmental Management (RIDEM). As was recommended by the USEPA Project Manager, the Navy is proceeding with the cleanup at OFFTA as a removal action under lead agency authority instead of using the approach described in the draft Proposed Plan (PRAP) previously submitted for this site. The Navy was informed at that meeting that this approach would allow the agencies to move forward with cleanup and thus avoid dispute resolution. As stated in our letter dated December 12, 2002, the Navy discussed this recommended approach and agreed to move forward with the removal action scenario. This would allow on shore clean up work to proceed without any additional delays while allowing the parties to continue the discussion of what should be done with the off shore sediments.

The Navy maintains that the results of recent data collected demonstrate that there are several uncertainties that need to be fully understood, before an appropriate alternative can be selected for the sediment component of OFFTA. To address these uncertainties, the Navy proposes to collect data that will: (1) determine whether contaminant concentrations are site-related, (2) evaluate sediment transport dynamics off-shore of Coaster's

5090
EV23/JS
February 6, 2003

Harbor Island, (3) determine contaminant concentration, and toxicity trends, (4) assess ambient concentration trends in Narragansett Bay, and (5) evaluate microbial degradation potential in the sediments adjacent to OFFTA and in Narragansett Bay. The Navy will collectively work with the respective agencies in developing a data collection plan to support this effort. We look forward to working with your office and RIDEM in developing a work plan that once implemented will answer the uncertainties with respect to the sediment adjacent to OFFTA.

The Navy also shares your concerns about keeping any additional administrative costs for the removal action approach to a minimum verses those already expended in producing the PRAP. However, this approach was recommended by your staff as a means for the Navy to move forward with cleanup verses moving forwarded with a PRAP as originally planned and having USEPA invoke formal dispute at this site. In addition and more importantly, the Navy's offshore sediment approach is consistent with recent Navy policy (*Policy On Sediment Site Investigation and Response Action*, Feb. 8, 2002) and recent EPA Guidance (*Principles for Managing Contaminated Sediment Risks at Hazardous Waste Sites*, OSWER Directive 9285.6-08, Feb. 12, 2002). Cleaning up the onshore contamination now under our removal action authority accelerates the cleanup of the site. Continued monitoring of the offshore will also allow time to collect the needed data to select an appropriate alternative instead of prematurely selecting a costly and potentially unnecessary offshore cleanup.

With regard to preventing exposure to OFFTA media, please note that access to OFFTA remains limited because of the existing fence around the site. Under the current scenario of recreational use, there are no unacceptable human health risks using EPA criteria from exposure to soil, sediment, or groundwater even if there were access to the site. In addition, from the ecological perspective, recent sediment sampling demonstrated that there are no exceedances of ecological based PRGs in the nearshore area. However, should any of the new offshore monitoring data suggest that site-conditions have changed, then the Navy will inform EPA of any necessary actions

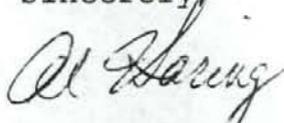
5090
EV23/JS
February 6, 2003

needed to prevent unacceptable risk from exposures to sediment, soil or groundwater and implement those required actions with USEPA concurrence.

Since the removal action is an interim action to the overall final remedy, the Navy will be submitting an extension of the FFA deadlines for the draft ROD, however the cleanup of the onshore area will proceed without any delays. We believe the most responsible cleanup approach is to conduct the onshore soil removal action while more conclusive data is collected for the sediment and postpone the draft ROD to a later date. This would allow the onshore cleanup work to proceed and allows the parties involved to continue the discussion of what needs to be done with respect to the offshore sediment issues.

The Navy continues to support the team effort approach to expeditiously remediate this site as well as the remaining sites under the Installation Restoration Program at the Naval Station, Newport.

Sincerely,



A. E. HARING, P.E.
Head Environmental Restoration Division
By direction of the
Commanding Officer

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