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C-NAVY-01-04-1685W

January 29, 2004

Project Number N4152

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

Reference: CLEAN Contract No. N62472-94-D-0888  
Contract Task Order No. 0833

Subject: Summary of Discussions, January 18, 2004  
Installation Restoration Program Sites  
Naval Station Newport, Newport Rhode Island

Dear Mr. Frye:

Provided as Attachment A you will find a summary of discussions from the meeting held at Naval Station Newport on January 21, 2004. This meeting was held to discuss the status of and next steps for the various Installation Restoration (IR) program sites for NAVSTA Newport.

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'.

Stephen S. Parker, L.S.P.  
Project Manager

SSP/rp

Enclosure

c: A. Cerise, NSN (2 w/encl.)  
P. Kulpa, RIDEM (4 w/encl.)  
K. Keckler, USEPA (4 w/encl.)  
J. Trepanowski/G. Glenn, TtNUS (w/ encl.)  
File N4152-3.2 w/o encl, N4152-8.0 (w/encl.)

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**Attachment A**  
**Meeting Notes, RPMs Meeting**  
**January 21, 2004 NAVSTA Newport**

Attending:

Amanda Cerise, NAVSTA  
Curt Frye, EFANE  
Todd Bober, EFANE  
Stephen Parker, TtNUS  
Kymberlee Keckler, USEPA  
Paul Kulpa, RIDEM

Convened at 2:00 PM

Agreed to run through sites and discuss next steps, as described below:

**McAllister**

T. Bober explained that the Navy has initiated the contracting process for offshore monitoring, including chemistry tests, and toxicity tests, as a part of long term monitoring (the offshore component of the ROD). The groundwater and air monitoring that has been done so far at the landfill has been done under the Interim Monitoring Plan, provided by Foster Wheeler in 1999. The Navy is in the process of developing a final monitoring plan, that is comprehensive of groundwater, air, sediment etc. The Navy intends to send the draft monitoring plan to the regulators for review. As part of the draft monitoring plan, the Navy will evaluate previous sampling results to streamline future monitoring events based on observable trends or other factors. The Navy also intends to conduct modeling of air emissions as per previous request by RIDEM. Because it is believed that it will take a longer time to evaluate the air modeling, the Navy has split that part out from the draft monitoring plan so that the sediment and groundwater monitoring plan can be finalized earlier than the air monitoring portion. Finally, a report on the marine habitat monitoring that has been conducted during 2003 will be provided for review.

P. Kulpa noted that under solid waste regulations, the Navy has to monitor landfill gas emissions quarterly. Separate from that, the Navy has to address the air quality regulations, and modeling may address those requirements. Paul also indicated he would like to be informed of the next monitoring event so he can attend. Paul requested the habitat monitoring report be provided to Chris Powell at State Fish and Wildlife (he will provide address).

**Old Firefighting Training Area**

C. Frye explained that the first step of the removal action will take place this summer, and will include the removal of the mounds. The Navy intends to provide a contract under the Navy's EMAC program to remove the mounds. Award planned before end of March. C. Frye pointed out that the EMAC is a firm-fixed price contract vehicle; therefore any issues concerning the scope of the work need to be sorted out prior to award to avoid costly contract modifications and/or delay costs after award. One of the submittals from the EMAC contractor will be a work plan describing how they intend to conduct the removal, and where the materials will be taken for disposal. The Work Plan will be submitted to EPA and RIDEM for review. Additionally, the Navy will monitor sediment before and after construction to assure no contaminant migration.

Issues:

1. P. Kulpa stated that the Navy needs a CRMC permit – Navy would like to involve CRMC early so they can expedite the permit. Work will be conducted near the shoreline, at the western mounds. P. Kulpa suggested providing a brief description of the work and

erosion controls to him. Paul agreed to contact CRMC and set up a meeting/conference call between RIDEM, CRMC, and the Navy to discuss coastal zone requirements.

2. K. Keckler stated that the Navy needs a waiver to conduct a removal action costing over \$2M, and extending more than 6 months.
3. K. Keckler stated that the Navy needs to complete the Action Memo before the removal action excavation begins. EPA offered to expedite review of the Action Memo and work plans as they are received.
4. K. Keckler requested that the Navy consider removing two feet of sediment in the intertidal area (orange area shown in the Feasibility Study) as a compromise for addressing the marine sediment. K. Keckler also stated that since rubble at the shoreline will be removed and some revetment construction will have to be conducted anyway, this seems to be the time for such an action. RIDEM agreed, and stated that existing data shows PRGs exceeded within the upper two feet of sediment. The removal area would have to be back-filled after excavation. The Navy indicated additional testing may be appropriate to confirm that a two foot depth would be an appropriate target and that the Navy's sediment experts would need to be involved in this decision.

#### **Sediment Issues at Various Sites –**

The Navy explained that a meeting is needed to discuss sediment and ecological risk assessment issues that are outstanding at OFFTA, Derecktor, and Gould Island (measurement of risk, background conditions, contaminant contributions from other sites, development of PRGs, etc). The Navy also stated that they are concerned about initiating the Gould Island offshore sediment study when there is currently no agreement with RIDEM on how to evaluate cleanup requirements for sediments. Normally, under Navy and USEPA Region I Guidance, the Data Quality Objectives requirements are set forth prior to initiating the field investigation so that everyone agrees up front how decisions will be made from the field data to determine remedial requirements.

K. Keckler agreed to a meeting, but requested that the parties work together on an agenda.

P. Kulpa acknowledged that RIDEM does not concur with the process used to develop PRGs, but may, on a site specific basis, agree to alternatives that come from them, as was the case at McAllister.

Navy indicated that they do not want to re-invent the PRG development process.

P. Kulpa indicated he would have to ask RIDEM management if a sediment meeting would be acceptable.

A. Cerise stated that the Navy intends to move one of the two carriers docked at Pier 1 in approximately two years.

#### **Coddington Cove Rubble Fill Area**

T. Bober requested input from regulators regarding starting a new site investigation (as stated in the existing FFA schedule). CCRF site is scheduled for an SASE work plan June 2004, and there is no information regarding contaminants at that site. Navy suggested conducting test pits and sample collection to provide initial data, and then doing the SASE work plan as needed.

K. Keckler indicated that the EPA's priority is 1) McAllister, 2) OFFTA, 3) Derecktor, and 4) Gould Island. Activities should not draw funds from completing remedial actions at these sites based on current data.

It was agreed that some initial field investigations should be conducted at CCRF site since the Navy can conduct their own investigations, but that the USEPA and RIDEM should be notified well in advance of the fieldwork in case they desire to oversee it. In addition, the Navy could request an extension on the submittal of the SASE work plan if funds are better spent elsewhere.

#### **Surface Water Officers School (SWOS) -**

T. Bober indicated that SWOS has a similar issue as CCRF, ie it is a new site. It is known that oil and lead are present at a few locations in the soil, found during building construction.

K. Keckler stated that if the Navy wants to make it an FFA site, they need to send an official letter stating that fact, and provide a schedule to address it in accordance with the FFA procedures. T Bober stated that the USEPA and RIDEM already had been officially notified that this area is a new site but acknowledged that official schedules were necessary in accordance with the FFA

#### **Derecktor Shipyard –**

T. Bober stated that in 1999, the FS was placed on hold, and may need to be revised per current conditions. Navy intends to conduct additional sediment sampling at Coddington Cove to confirm contaminant levels and that the current FS accurately reflects conditions at the Derecktor area. Also, there was no agreement on the direction to take for the remediation, considering RIDEM objection to the PRG development and considering the general disagreement about which sediments require remediation. The next step is to host a sediment meeting with many of the appropriate RIDEM and Federal trustees to attempt to resolve sediment issues that are critical to determine the cleanup requirements for the site.

#### **5 Year Review –**

Navy intends to conduct a 5 year review this year in accordance with 2001 guidance. All agreed that this was necessary.

#### **NUSC Disposal Area –**

S. Parker stated that the Draft SASE report for this site is anticipated for delivery Feb/March for review. Background work plan is under review by regulators. The Navy will decide if a removal action should be undertaken to remove drums and paint cans.

P. Kulpa stated that the background locations are unacceptable to RIDEM based on current regulations. RIDEM will not consider samples collected at golf course or farm areas as background because these areas are assumed to be contaminated. He also stated that other projects have conducted successful background studies on wooded areas in this area. Paul suggested TtNUS meet with RIDEM and select locations. C. Frye asked what the value of the background study would be if RIDEM finalized the proposed remediation regulations which don't have a provision for background study. Paul indicated he was not sure.

K. Keckler stated that they will be providing minor comments to the background work plan. Regarding removal actions, K. Keckler stated that an EECA and Action Memo would be required for a Non-Time Critical Removal Action. (It was not clear what is needed to conduct a Time-

Critical removal action.) The SASE report could be the basis of the EECA, but the other steps would still have to be conducted (cost estimates, and alternatives screening and analysis).

### **Gould Island –**

S. Parker stated that the response to comments to the Draft Final RI Work Plan is outstanding – Navy requested meeting to discuss sediment issues, particularly regarding this site, as sediment assessments are complicated by other sites on Gould Island (FUD sites) and other watershed contaminants. In addition, need to discuss with RIDEM the need for additional sample stations they requested in the onshore portions of the site.

K. Keckler stated that a request for extension is needed to extend the time for response to comments.

Navy agreed to review comments and discuss requests for additional on shore sample stations with RIDEM.

### **Tank Farms 4 and 5 –**

C. Frye stated that the current plan is to lease property to a developer, the Navy will retain ownership, there will be a PPV arrangement.

K. Keckler said that there can be no hindrance on continuation of the CERCLA investigations and cleanup, and the use must be acceptable under a CERCLA-based risk assessment. Tank Farms 4 and 5 still have outstanding issues, and Tank farms 1, 2 and 3 are unknowns.

C. Frye explained that a response to the regulators comments on the work plan for Tank Farms 4 and 5 will be issued soon, and the Navy will complete the EGIS that will show all the data that has been collected at Tank Farms 4 and 5. This data may show that some of the information the regulators are requesting is not necessary, or already in place.

P. Kulpa explained that some of the tank farm samples collected historically are not acceptable as site information, due to the way in which they were collected (compositing, field handling).

C. Frye also indicated that for the groundwater operable unit at Tanks 53 and 56, There is still an interim ROD. The Navy intends to develop a final ROD, which will state whether continued monitoring or restriction of groundwater use will be needed. S. Parker stated that monitoring conducted in previous years at these wells showed no contaminants above MCLs for several rounds. In the fourth round report, it is noted that samplers found some well casings and surface seals were damaged, and contaminants were detected above MCLs in those wells during that round. Damage to the seals indicate runoff may have intruded into the wells, so the Navy intends to repair the wells, re-develop them, conduct a fifth round of monitoring, and move on from there. If repaired wells show no contaminants above MCLs, Navy will seek to discontinue monitoring with a no further action ROD.

P Kulpa stated that sufficient data needs to be collected to evaluate trends in the groundwater (eg. seasonal trends)

Meeting adjourned at 5:10 PM