



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

N62661.AR 001782
NAVSTA NEWPORT RI
5090 3a

August 5, 2004

Curtis Frye
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: Action Memorandum for a Non Time Critical Removal Action: Soil and Debris Mound
Removal at OFFTA

Dear Mr. Frye:

EPA reviewed the *Action Memorandum for Non Time Critical Removal Action: Soil and Debris Mound Removal* dated June 2004 in light of its technical sufficiency and adherence to applicable guidance including *Conducting Non-Time-Critical Removal Actions Under CERCLA*. Publication: 9360.0-32FS, EPA/540/F-94/009 December 1993. Overall, EPA is pleased that the Action Memorandum includes the elements specified in the Fact Sheet *Conducting Non-Time-Critical Removal Actions Under CERCLA*. Publication: 9360.0-32FS, EPA/540/F-94/009 December 1993. Detailed comments are provided in Attachment A.

I look forward to working with you and the Rhode Island Department of Environmental Management toward the cleanup of the OFFTA. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,

Kimberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: Paul Kulpa, RIDEM, Providence, RI
Cornelia Mueller, NETC, Newport, RI
Bryan Olson, USEPA, Boston, MA
Jennifer Stump, Gannet Fleming, Harrisburg, PA
Steven Parker, Tetra Tech-NUS, Wilmington, MA

ATTACHMENT A

| <u>Page</u> | <u>Comment</u> |
|--------------|---|
| p. 1 | Portions of the base are also located in the Town of Jamestown, RI. |
| p. 2 | The estimated depth to groundwater and anticipation of encountering groundwater during the removal action is not included in the site description. Information about groundwater would be good to include in the site description. |
| p. 5, §6 | Total site risks, as reported in the Phase I RI, were much higher and should be listed here. |
| p. 6 | The proposed actions are briefly stated. Fence removal or modification to allow equipment access and then to secure the work area is not included as an action. The restriction of access through fencing and posting of warning signs in the area is not specified. It is important that access is restricted during the removal action. |
| p. 6, ¶3 | <p>The Central Mound, Mound No.1, and Mound No.2 volumes presented in the table do not correspond to the volumes specified in the <i>Excavation, Transportation and Disposal Services Work Plan</i>. For example, the Central Mound volume is specified as having a total volume of 9,500 cubic yards in the Action Memo and a volume of approximately 7,000 cubic yards in the <i>Excavation, Transportation and Disposal Services Work Plan</i>.</p> <p>The total volume of the mounds presented in the Action Memo (15,100 cy) is not consistent with the volume used in the FS cost estimate (10,900 cy).</p> |
| p. 7 | Confirmatory sampling is not discussed in the text. Will soil data be collected and compared to the removal action goals specified in Table 1? |
| p. 8, e | Add RCRA and its implementing regulations. |
| p. 8, §9 | No information has been provided to EPA to demonstrate that the hydrocarbons are degrading with bacterial action or that concentrations are decreasing. Please delete these statements from the Action Memorandum. |
| Attachment C | The Administrative Record should include the documents used as the basis for the decision. The NUSC disposal area SASE was inadvertently listed as part of the Administrative Record and should be deleted from the table. The September 2002 OFFTA FS is not listed as part of the Administrative Record. Information contained within the September 2002 FS was used as a basis for the decision and thus needs to be listed in the Administrative Record and be available for public review. |