



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

N62661 AR 001875  
NAVSTA NEWPORT RI  
5090 3a

January 25, 2005

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: Responses to EPA Comments on the Draft Soil Pre-Design Investigation Report for the Old Fire Fighting Training Area in Naval Station Newport, Newport, RI

Dear Mr. Frye:

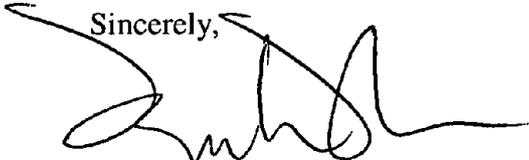
EPA reviewed the Navy's responses, dated December 23, 2004, to EPA's comments on the *Soil Pre-Design Investigation Report for the Old Fire Fighting Training Area*, Naval Station Newport, Newport, Rhode Island dated July 2004. Additional comments are only provided for those responses that are not considered adequate or for which additional discussion is required. Many of the responses indicate that the Navy will review the text referenced in the comment and make the appropriate changes, if any. Detailed comments are provided in Attachment A.

1. The Navy's proposed revised excavation alternatives were submitted with the Constructability Review for Soil Removal and Revetment Construction document on December 23, 2004 and briefly reviewed by EPA before our January 13, 2005 conference call with the Navy. Additional discussion of these alternatives is warranted and EPA understands, per our teleconference, that the Navy will be submitting additional information before our February 3, 2005 meeting.
2. Based on the Navy's most recent submittal, additional discussion is warranted. Please refer to the comment on the response to General Comment #1.
3. Please refer to the comment on the response to General Comment #1.
4. Regarding the Navy's response that discusses the limits of the soil excavation work, EPA generally agrees that the intent was to limit the soil excavation scope of work horizontally to the mean high water (tide) elevation, depending on the nature of the contaminants, remnants, and debris identified during the excavation work. For example, the identification of concrete structures that extend beyond this boundary would be cause for increasing the scope of the excavation locally to remove the foundation or at a minimum, confirm that no sources of contamination remain in place. Further discussion of this point is warranted.

Regarding the construction of the shoreline protection system, EPA expects that excavation of the surface and near-surface sediment seaward of the mean high water elevation and even seaward of the mean low water elevation will be required, as the Navy depicted in Figure 1 of the Constructability Review document.

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

Sincerely,



Kymberlee Keckler, Remedial Project Manager  
Federal Facilities Superfund Section

Attachment

cc: Paul Kulpa, RIDEM, Providence, RI  
Cornelia Mueller, NETC, Newport, RI  
Jennifer Stump, Gannet Fleming, Harrisburg, PA

## ATTACHMENT A

- | <u>Comment #</u> | <u>Comment</u>   |
|------------------|--|
| 6.               | Please refer to General Comment #4 additional comment.   |
| 7.               | Please refer to General Comment #1 additional comment.   |
| 9.               | Response acknowledged; however, the Navy's submittal of December 23, 2004 appears to supercede the referenced information.   |
| 24.              | Appendix F, Table F-7:   |
|                  | b. Grid Cell C-2:  |
|                  | 2. Please refer to General Comment #2 additional comment.  |
|                  | c. Grid C4:  |
|                  | 1. EPA agrees that additional investigation may be postponed and the PDI Report completed without that additional investigation. Following submittal of the PDI Report, EPA will provide input regarding the scope of the additional investigation required. Further exploration within Grid C-4 is one area where site characterization is considered inadequate. |
|                  | d. Grid B4:  |
|                  | 1. Please refer to General Comment #1 additional comment.  |
|                  | e. Grids B5, B6, & B7 and C5, C6, & C7:  |
|                  | 1. Please refer to General Comment #1 additional comment.  |
|                  | f. Grid C8:  |
|                  | 1. Please refer to General Comment #1 additional comment.  |
|                  | g. Grids A5, A6, & A7:   |
|                  | 1. Please refer to General Comment #1 additional comment.  |
|                  | h. Area 5, general:  |
|                  | i. Grid B8:  |
|                  | 1. Please refer to General Comment #1 additional comment.  |
|                  | j. Grid B9:  |
|                  | 1. EPA agrees that additional investigation may be postponed and the PDI Report completed without that additional investigation. Following submittal of the PDI Report, EPA will provide input regarding the scope of the additional investigation required. Further exploration within Grid B-9 is one area where site characterization is considered inadequate. |
|                  | 2. Please refer to General Comment #1 additional comment.  |
|                  | k. Grids C9 & C-10:  |
|                  | 1. EPA agrees that additional investigation may be postponed and the PDI Report completed without that additional investigation. Following submittal of the PDI Report, EPA will provide input regarding the scope of the additional investigation required.   |

Further exploration within Grids C-9 and C-10 are areas where site characterization is considered inadequate.

2. Please refer to General Comment #1 additional comment.
- l.&m. Grid C11 &Grid A8:
1. Please refer to General Comment #1 additional comment.
- n. Grid A9:
1. Please refer to General Comment #1 additional comment.
- o.-s. Grid B10,Grid B11,Grid A7,Grid A10, & Grid B12:
1. Please refer to General Comment #1 additional comment.