



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

N62661 AR 001922
NAVSTA NEWPORT RI
5090 3a

May 16, 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 Excavation Constructability Review for the Old Fire Fighting Training Area at Naval Station Newport

Dear Mr. Frye:

EPA reviewed the Navy's responses, dated April 22, 2005 to EPA comments, dated February 22, 2005, on the OFFTA Excavation Constructability Review documents. Detailed comments are provided in Attachment A.

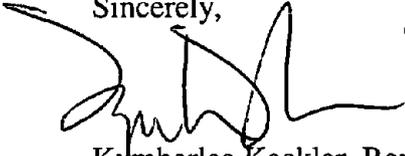
Please note that the following general comment is pertinent to all the Navy's responses since the Removal Action Work Plan will present the details of the removal action agreed to:

All comments and responses relative to the constructability review documents submitted by the Navy are superseded by our mutual general agreement regarding the general scope of the removal action to be completed at the Site. That agreement requires that the Navy excavate as deep as is practical in areas of the Site where organic contaminants of concern exceed the cleanup goals. This includes excavation beneath the water table elevation to the extent that this is effective in removing contaminants of concern and does not endanger the health and safety of Site workers or equipment. Also, clean soil will be removed and temporarily stockpiled if it will facilitate the removal of contaminants of concern from deeper excavations. In addition, the Navy has committed to remove subgrade concrete structures and to investigate such structures for and remove non-aqueous phase liquids (NAPLs) or other contaminants that could potentially migrate from such structures during removal operations. The Navy will also construct a shoreline revetment to protect the Site from erosion and, in the course of constructing the revetment, will excavate marine sediment, debris, and contaminated soil to the extent necessary to provide a stable foundation for the revetment, minimize shoreline elevation changes, and prevent the migration of contamination from beneath the revetment to the surrounding surface water and sediment. It is mutually agreed that the details related to the completion of the removal action will be presented in the Navy's Removal Action Work Plan, which will be submitted to regulators for review and concurrence prior to the initiation of removal action operations at the Site.

In the interests of closing the dialogue on the constructability documents, the following Specific Comments on the Navy's responses are presented using the numbering system used in the responses. There is no need to spend additional resources revising the constructability documents.

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 or wish to arrange a meeting.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kimberlee Keckler', written over a horizontal line.

Kimberlee 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>Page</u>	<u>Comment</u>
pp. 1 & 2	Cost issues are no longer relevant and there is no need to revise the constructability documents.
Figures 1 & 2	Agreed - a detailed revetment design will be provided in the Removal Action Work Plan.
Figures 2-8	<p>Cost issues are no longer relevant and there is no need to revise the constructability documents. EPA understands that excavation depths were averaged in the constructability documents to facilitate making cost estimates. These excavation depths will not necessarily be the same depths required by the Removal Action Work Plan.</p> <p>The Removal Action Work Plan will provide the details of the removal action that will be implemented. The Pre-Design Investigation Report may make recommendations but the Removal Action Work Plan will supercede any information in the Pre-Design Investigation (PDI) Report.</p> <p>EPA understands that the minimum excavation depth will be the historically low water elevation, as requested by the Rhode Island Department of Environmental Management.</p>
Figure 6	EPA expects that the PDI Report will be corrected as appropriate but there is no need to spend additional resources on correcting the constructability documents as they have been superceded by our general agreement on the removal action that will be implemented.
Figure 7	Agreed - there is no need to spend additional resources on revising the constructability documents. The details for the selected removal action will be presented in the Removal Action Work Plan.
Figure 8	EPA understands that excavation depths were averaged in the constructability documents to facilitate making cost estimates. These excavation depths will not necessarily be the same depths required by the Removal Action Work Plan.
Figure 9	Agreed - there is no need to spend additional resources on revising the constructability documents.