



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

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NAVSTA NEWPORT RI
5090.3a

September 19, 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: Soil Pre-Design Investigation Report Addendum for the Old Fire Fighting Training Area

Dear Mr. Frye:

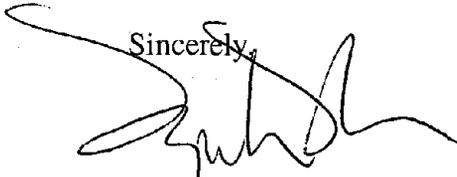
EPA reviewed the *Soil Pre-Design Investigation Report Addendum for the Old Fire Fighting Training Area*, Naval Station Newport, Newport, RI dated August 2005 in light of its completeness, technical accuracy, and consistency and for incorporation of EPA's earlier comments. Detailed comments are provided in Attachment A.

1. The supplemental borings confirmed that there are additional areas of the Site where significant concentrations of contaminants (TPH and PAHs) are located more than approximately two to three feet below the water table. The magnitude of these contaminant concentrations creates greater concern that these contaminants would be an on-going source of contamination to the shoreline sediments. This increasing evidence of deeper contamination in more areas of the Site calls into question the strategy to remediate the Site without the use of sheet piling. If these areas of significant contamination were not removed, which ultimately may not be an option, long-term monitoring of the shoreline would be required, with the potential for additional remediation if contaminant migration persists.

Three of the thirteen direct-push borings required by the work plan did not produce any samples for contaminant analysis in the targeted zone. Although these borings were located in areas where recovery should have been made based on the apparent depth of bedrock, the nature of the fill, apparently containing large concrete pieces at shallow depth, prevented soil recovery for sampling. The loss of this data is unfortunate and, if not addressed before the remedial action, will have to be dealt with during the excavation of the Site, possibly by planning more extensive sampling or deeper excavations in these areas.

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,

A handwritten signature in black ink, appearing to read 'Kymberlee Keckler', written over the word '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>Page</u>	<u>Comment</u>
p. 2, §3.0	In the second paragraph, the description of the limits of the depth of contamination is misleading and not consistent with the information presented in the boring logs. The boring logs indicate that there is visual and olfactory evidence of petroleum contamination down to at least 10 feet below ground surface (the limits of the borings) in the majority of the supplemental borings. Furthermore, analytical data indicates that in several borings significantly elevated contaminant concentrations were found in the deepest sample interval analyzed, generally eight feet below ground surface, indicating that significant contamination should be anticipated in deeper soil. Please edit this paragraph to more accurately characterize the vertical extent of contamination as recorded in the boring logs.
Figure 4-8, SB502	The lead value for the 4-6 foot interval is reported as 1,800 ppm in this figure but reported as 1,500 ppm in Table 1 and in Appendix B.
Figure 4-8, SB505	The chrysene value for the 6-8 foot interval is reported as 61,100 ppm in this figure but reported as 6,100 ppm in Table 1 and in Appendix B.
Table 1	The PRGs for benzo(g,h,i)perylene and benzo(k)fluoranthene have been transposed. Please correct.
Appendix B	For sample OFF-SB-505-0406, both fluoranthene and pyrene exceeded the Rhode Island direct contact residential criteria and the fluoranthene criterion was also exceeded in sample OFF-SB-505-0608. Since these samples had exceedances of other PAHs, the omission of them in Table 1 is probably not consequential, but it should be corrected.