



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

N62661.AR 001987  
NAVSTA NEWPORT RI  
5090 3a

October 27, 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: Technical Review Comments on Draft Project Close-Out Report for Excavation, Transportation and Disposal Services at Site 09 - Old Fire Fighting Training Area

Dear Mr. Frye:

EPA reviewed the *Draft Project Close-Out Report for the Excavation, Transportation and Disposal Services, Site 09 - Old Fire Fighting Training Area, Newport, RI, dated September 2005* in light of its completeness, technical accuracy, and consistency. Detailed comments are provided in Attachment A.

The Draft report does not include copies of the manifests, bills of lading, weigh slips, and treatment/disposal certificates as required by the Work Plan. Please include these documents in the next revision of this report to properly document the disposition of the materials removed from the Site. I recognize that there is a lot of paperwork, so an electronic submittal on a CD is suitable.

The Work Plan did not discuss requirements related to management of asbestos-containing materials other than to say that samples may be collected for analysis. However, the Draft Close-Out Report indicates that asbestos-containing material was encountered and managed during this project. Please edit the report text to describe the asbestos material, including an assessment of its condition, and discuss how it was managed and what safety precautions were implemented for workers and nearby off-site personnel. Was the soil in the vicinity of the asbestos-containing material sampled and analyzed for asbestos? Was air monitoring implemented? What involvement did the Navy have in the planning for the management of the asbestos-containing material?

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,

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>
p.2, §2.0	The text states that the work was performed in accordance with the work plan with no exceptions. That is not correct as exceptions were noted in the report itself and additional exceptions are indicated by these comments. Please edit this section to identify the exceptions to the work plan.
p. 3, §5.0	Please edit the report text to indicate how many stockpiles of soil were created and sampled for each of the three mounds that were removed from the Site.
p. 4, §5.0	<p>The first sentence on the page states that geotextile was not installed at the former Central Mound because of concrete debris at the surface. Please edit the text to clarify the nature of the debris and its extent (annotate a Site drawing). If a concrete pad was encountered that extended across the entire former Central Mound, the need for a geotextile barrier would be obviated. If the concrete debris was discontinuous rubble that did not extend across the entire former Central Mound, installation of a geotextile might have been expected, as required by the Work Plan.</p> <p>Was the Site beneath the central mound graded to one foot below the base grade elevation as required by the work plan, or did the concrete debris prevent that from occurring?</p> <p>Please edit the text to indicate if any of the jersey barriers that were installed for erosion protection were left in place after demobilizing from the Site.</p>
p. 5, §7.0	Please clarify the method for soil sample collection and preservation for volatile organic compound (VOC) analyses.
Appendix A	There are several documentation pages missing from the shipment records compiled in this appendix. No records are provided for stockpiles 03-0006 through 03-0011 and many more records for other stockpiles are incomplete based on the volume of material shipped for each stockpile. Please review and correct the appendix to provide complete records.
Appendix B	The plan for 01-11-05 includes stockpiles 02-0006 and 02-0007 and the plan for 01-28-05 does not; however, the plan for 02-02-05 includes stockpiles 02-0006 and 02-0007 again. It is presumed that the 02-02-05 plan is not correct, but please review and make the appropriate correction to the plans.
Appendix D	<p>Review of the laboratory data provided in this appendix indicates that several laboratory reports have not been provided. Please provide the missing data in the next version of the report. Laboratory reports are missing for the following stockpiles:</p> <ul style="list-style-type: none"><li>· 03-0001</li><li>· 03-0002</li><li>· 03-0003</li><li>· 03-0005</li><li>· 03-0010</li><li>· 02-0001</li><li>· 02-0002</li><li>· 02-0006</li><li>· 02-0007</li></ul>