



DEPARTMENT OF THE NAVY

ENGINEERING FIELD ACTIVITY, NORTHEAST
NAVAL FACILITIES ENGINEERING COMMAND
10 INDUSTRIAL HIGHWAY
MAIL STOP, #82
LESTER, PA 19113-2090

N62661.AR.002005
NAVSTA NEWPORT RI
5090 3a

IN REPLY REFER TO

5090
Code EV23/CF
December 8, 2005

Ms. Kymberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section
USEPA Region 1
1 Congress Street, Suite 1100
Boston MA, 02114-2023

Dear Ms. Keckler:

SUBJECT: DRAFT CLOSE-OUT REPORT, EXCAVATION, TRANSPORTATION, AND
DISPOSAL SERVICES FOR MOUND REMOVAL AT SITE 009, OLD
FIREFIGHTING TRAINING AREA, NAVAL STATION NEWPORT, NEWPORT,
RHODE ISLAND

Enclosed please find responses to your comments for the subject
report. Based on these responses, the report will be finalized and
submitted shortly. RIDEM did not have any comments on the report.

If you have any questions, please do not hesitate to contact me at
(610) 595-0567 extension 142.

Sincerely,

CURTIS A. FRYE, P.E.
Remedial Project Manager
By direction of the
Commanding Officer

Enclosure:

1. Responses to USEPA Comments, Draft Close-out Report for
Excavation, Transportation, and Disposal Services, Site 09,
Old Fire Fighting Training Area, Naval Station Newport,
Newport, RI, June 2004 (Comments of October 27, 2005)

Copy to:

- C. Mueller, NSN
- P. Kulpa, RIDEM
- B. Krivinskas, ROICC Newport
- J. Stump, Gannett Fleming
- S. Parker, TtNUS
- M. Newberry, Universe Technologies

NAVY RESPONSE TO EPA COMMENTS
ON DRAFT CLOSE-OUT REPORT
EXCAVATION, TRANSPORTATION AND DISPOSAL SERVICES
FOR MOUND REMOVAL, OFFTA, SITE 009
NEWPORT NAVAL STATION, NEWPORT RHODE ISLAND
(comments dated 27 October, 2005)

EPA Comments:

1. General Comments:

- 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.

NAVY RESPONSE: Copies of the bills of lading, weight slips and treatment/disposal certificates will be included with the final report as required by the work plan.

- b. 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?

NAVY RESPONSE: The requested asbestos information will be included in the final report.

2. Specific Comments:

- a. 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.

NAVY RESPONSE: We will add the exceptions about the asbestos and the concrete debris encountered to the final report.

- b. 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.

NAVY RESPONSE: The stockpile information will be added to the report.

- c. p. 4, §5.0. 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. 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?

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.

NAVY RESPONSE: We edited the text to clarify the nature of the debris and its extent. In lieu of site drawings, we included photographs showing the concrete pad. A more detailed narrative is included describing where the geotextile fabric was placed. Additional information requested about the site grading and jersey barriers will also be included in the final report.

- d. p. 5, §7.0 Please clarify the method for soil sample collection and preservation for volatile organic compound (VOC) analyses.

NAVY RESPONSE: The soil sample collection and preservation methods will be included in the final report.

- e. 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.

NAVY RESPONSE: The missing records will be included in the final report.

- f. 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.

NAVY RESPONSE: The plan will be corrected in the final report.

g. Appendix D. 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:

- 03-0001
- 03-0002
- 03-0003
- 03-0005
- 03-0010
- 02-0001
- 02-0002
- 02-0006
- 02-0007

NAVY RESPONSE: The missing laboratory analyticals will be included in the CD with the final report.