



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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October 31, 2006

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James Colter, P.E.  
Remedial Project Manager (Code OPNEEV)  
Facilities Engineering Command, Mid-Atlantic  
Naval Facilities Engineering Command  
9742 Maryland Avenue  
Norfolk, VA 23511-3095

Re: Draft Action Memorandum for the Old Fire Fighting Training Area

Dear Mr. Colter:

EPA reviewed the Draft Action Memorandum for Old Fire Fighting Training Area (Site 09), Naval Station Newport, Newport, RI, dated September 30, 2006 in light of its completeness, technical accuracy, and consistency. Detailed comments are provided in Attachment A.

On May 31, 2005, EPA commented on the PDI Report. Specifically, EPA stated that: "Some of the language used and data interpretation in the report when describing the nature and extent of contamination is not as meticulous as it could be, which creates implications regarding contaminant conditions with which EPA does not agree. However, in the interests of completing the Pre-Design Investigation (PDI) Report and moving on to the remedial phase, EPA accepts the findings of the investigation with the understanding that the details of the removal action will be resolved during development of the Removal Action Work Plan. To be clear, the data generated for the PDI Report will be used to guide the development of the Removal Action Work Plan but acceptance of the PDI Report creates no commitments regarding data interpretation or the details to be required in the Removal Action Work Plan."

EPA remains concerned that the Site has not been adequately characterized given its historical Site usage. In conducting a more extensive cleanup of the Site, as was envisioned before the Navy's Optimization Review, areas of the Site that had not been adequately investigated would have been investigated and contaminated soil would be removed during the construction. Now, if a limited removal is implemented, as the Navy proposes, areas of the Site could remain unexplored. As an example, it should be noted that only as a result of EPA pressing for additional borings at the Site was the one area found that Navy now proposes to remove. It is EPA's opinion that this is not the only area at the Site that meets the Navy's current removal criterion. Consequently, EPA does not believe the limited removal action proposed by the Navy should proceed without being coupled with additional surface and subsurface soil sampling in areas suspected to have high levels of contamination. The future Removal Action Work Plan should include additional investigations to locate and remove buried structures and take additional samples around any such structures.

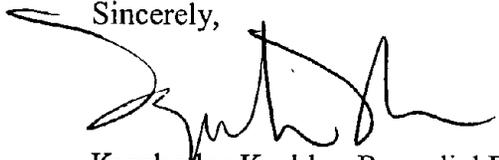
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I look forward to working with you and the Rhode Island Department of Environmental Management toward the cleanup of the Old Fire Fighting Training Area. Please do not hesitate to contact me at (617) 918-1385 should you have any questions or wish to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

## ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. 5, §6a	<p>Bullet 'a' states, "Although a risk evaluation for petroleum has not been conducted, there does not appear to be a current exposure route available to these contaminants, except to a construction worker excavating at the site." This statement is misleading. The top foot of soil contains PAHs and lead, and therefore a complete exposure pathway exists. Visitors and workers could contact PAHs and lead in the surface soil.</p>
p. 5, §6c	<p>The following text should be included under the regulatory authorities section, "The Navy is required to take response actions pursuant to CERCLA under the terms of the FFA."</p>
p. 6, §8a	<p>In the fourth sentence of the first paragraph the text states that the public comments do not require a revision of the proposed action. However, the action proposed in this Action Memorandum is significantly different from the action anticipated by the July 2003 Proposed Plan. Consequently, this sentence should be deleted or revised to reflect a change to the Navy's current plan.</p> <p>The first bullet states that the TPH contamination exceeding 30,000 mg/kg extends to a depth of 8 feet below ground surface. In fact, the greatest TPH concentration detected at the Site (40,270 mg/kg) was found at a depth of 6 to 8 feet below ground surface, while the sampling interval above (4 to 6 feet) had a TPH concentration an order of magnitude lower. Since no sample was collected deeper than 8 feet below ground surface, and field screening data and olfactory and visual evidence indicated significant contamination in the 8 to 10 foot boring interval, it is quite possible that the contamination could go deeper. The text should clarify this.</p> <p>The third bullet discusses inspection of the piping associated with the manhole structure but not removing it unless it is determined to be a continuing source. This is not sufficient. Any piping found during the removal action should be removed to ensure that contamination left in place during this removal action does not mobilize through the piping or pipe bedding to the site boundaries where it could migrate into the bay. Please revise this bullet accordingly.</p>
p. 7, §8a	<p>The sixth bullet indicates that the eelgrass beds will be protected to the extent possible. This is not sufficient. While it is understood that the details of the revetment will be provided in another document, it is critical that this Action Memorandum presents a more proactive commitment that will be consistent with the design activities. This includes taking all necessary measures to construct the revetment without adversely impacting the eelgrass beds. The preservation of the eelgrass beds cannot be compromised.</p>

Please explain the Navy's intent regarding confirmation sampling and post-excavation sampling. It is not clear from the descriptions on page 7 where these sampling activities will occur. The confirmation sampling description mentions excavations, which suggests that confirmation sampling will be implemented in excavations other than just the one excavation where TPH exceeded 30,000 mg/kg. However, the post-excavation description mentions excavations that could be interpreted to mean that post-excavation samples will only be collected from excavations other than the one associated with the UCL exceedance for TPH rather than from all soil left in place around the Site. Also, please define in the Action Memorandum what the Site contaminants of concern are for the post-excavation sampling.

The discussion under "Staging of Material" is not complete. Please state that water released by excavated soil and debris will be managed to prevent the migration of contamination. The details should be presented in the Removal Action Work Plan.

p. 9, §8g

The last sentence requires clarification. Five-year reviews and long-term monitoring of the revetment will likely be required to ensure that the remedy remains protective, unless future actions remove contamination to unrestricted concentrations. Please edit the text accordingly.

Figure 3

This figure is misleading because it only shows TPH contamination at an elevation of two feet (Naval base mean low water). Many locations have much greater TPH contamination than depicted in this figure. One or more additional figures should be provided to more accurately depict the concentrations of TPH in the soil. For example, a figure that presents the maximum TPH concentration at each location would be useful to assess the Navy's limited removal proposal.

Two of the most recent boring locations, SB503 and SB509, do not appear on Figure 3 and should be included.