



RHODE ISLAND  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

January 8 2007

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

**3700**

RE: Response to Comments on the Draft Action Memorandum, Soil Removal Action, Old Fire Fighter Training Area, Naval Station Newport, Newport, Rhode Island

Dear Mr. Colter,

The Rhode Island Department of Environmental Management, Office of Waste Management has reviewed the Navy's response to comments on the Draft Action Memorandum, Soil Removal Action for the Old Fire Fighter Training Area, dated December 1, 2006. The memorandum calls for the removal of surface and subsurface structures, the partial removal of contaminated soil and the installation of a stone revetment for erosion control.

In general, the Office reiterates its position that the Navy take advantage of this opportunity to expand the removal action in terms of remedial endpoints for contaminants of concern, such as TPH lead, and other which have exceeded regulatory standards in past investigations. It is recommended that the Navy review the proposed cost for the project, as the estimates appear to be high. The Office also questions the need for the wide revetment, especially in light of the fact that the proposed width will affect the characteristics of the beach and may adversely affect the adjacent eel grass beds.

In regards to the applicability of State regulations, please be advised that the cited regulations are considered ARARs and not To Be Considered as they deal directly with the proposed action. Finally, the Office of Waste Management is encouraged that the Navy will install passive collection piping at the site. It is suggested that the Navy further evaluate the other recommendations, which may be implemented, during the removal action.

The Office of Waste Management looks forward to working with the Navy in the remediation of this and other sites on the base. If the Navy has any questions concerning the above, please contact this Office at 401-222-2797, ext. 7111.

Sincerely,

A handwritten signature in cursive script that reads "Paul Kulpa".

Paul Kulpa

Office of Waste Management

cc: Matthew DeStefano, DEM OWM  
Richard Gottlieb, DEM OWM  
Kymberlee Keckler, EPA Region I  
Cornelia Mueller, NSN