



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
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BOSTON, MASSACHUSETTS 02114-2023

January 14, 2009

Winoma A. Johnson, P.E.
Remedial Project Manager
NAVFAC MIDLANT
Environmental Restoration OPHREV4
9742 Maryland Avenue
Building N-26, Room 3208
Norfolk, VA 23511-3095

Re: *Draft Removal Action Completion Report, Non-Time-Critical Removal Action for
Old Fire Fighting Training Area, NAVSTA, Newport, Rhode Island*

Dear Ms. Johnson:

EPA has completed its review of the *Draft Removal Action Completion Report, Non-Time-Critical Removal Action for Old Fire Fighting Training Area, NAVSTA, Newport, Rhode Island* dated December 2008. Our comments are found in an attachment to this letter. Please do not hesitate to contact me at (617) 918-1392 should you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Bob Lim".

Bob Lim, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc. Kymberlee Keckler, EPA
Todd Finlayson, Gannett Fleming
Paul Kulpa, RIDEM, Providence, RI
Cornelia Mueller, NETC, Newport, RI
Steven Parker, Tetra-Tech-NUC, Wilmington, MA

ATTACHMENT

EPA has reviewed the draft document entitled *Removal Action Completion Report for the Old Fire Fighting Training Area (OFFTA), Naval Station Newport, Newport, Rhode Island*, dated December 2008. Technical support is provided by EPA support contractor, Gannett Fleming, Inc.

GENERAL COMMENTS

1. The NTCRA also included replacement of the revetment wall, however, due to its different schedule, it obviously not present in this report. EPA reminds the Navy that a completion report will also be required for the revetment wall.
2. More detail is required in order to understand how the waste soil and debris was evaluated and managed. Sufficient detail should be provided so that a reader will know the character of each waste pile evaluated and what the disposition of each waste pile was. In addition, an organized compilation of all the analytical data collected is also required. Please supplement the report with that information. Comments presented below describe some of the details required to complete this report.
3. Please supplement this report with a table presenting a timeline and major milestones for this project including milestones leading up to the completion of the removal action.
4. Please supplement this report with a discussion of performance standards and construction quality control as detailed in EPA guidance EPA 540-R-98-016. This should focus on an evaluation of data quality (and include a discussion of the effectiveness of the field screening method) and on the adequacy of the construction methods and controls including a discussion of any lessons learned.
5. Please supplement the report with a section that presents and discusses deviations from the approved work plan. Include the rationale for the deviations.
6. Please add another figure that shows the test pits and excavations together with the historical OFFTA infrastructure (tanks, piping, etc.).
7. Please provide organized tables for all analytical data collected. It is noted that Table 3-2 does not include all analytical data collected. A separate table would be appropriate for all waste characterization data and other miscellaneous data such as back fill and top soil.
8. Include a TCLP data table as it was not found in the report.
9. Please incorporate a description of the waste characterization composite sampling protocol used for each waste characterization sample collected.
10. Please provide a table identifying where the various waste piles (i.e., WC-07 et al) were disposed of to supplement the table provided in Section 3.
11. Please identify which waste piles were chemically treated for lead toxicity.

12. The drawings do not correctly depict the existing conditions regarding the fencelines. Please edit the drawings to show the correct existing fencelines. Also for clarity correct the line style for the fenceline that bounds the site so it shows as a fenceline.
13. Please provide a separate figure depicting the site piping associated with the large concrete pad and oil water separator that is based on the findings of the field investigation. If the piping configuration based on the field investigation is the same as that based on historical drawings please incorporate a discussion of that finding in the report in lieu of the separate piping drawing.
14. There are concerns about the manifests/shipping documents provided in Attachment A. The forms have not been correctly completed and provide incorrect information to the disposal facilities. This pertains to documents in Appendices E and F in particular where the forms indicate that the waste was not treated for lead when it was and the waste was not from a mandated federal or state cleanup site when it was. Also, the documentation provided in these appendices (and the other appendices) do not include the waste characterization analytical reports which are a necessary component of the shipping/disposal documentation. Please provide the appropriate analytical characterization reports for each appendix and each waste characterization sample.
15. It is not apparent that the work plan allowed sidewall composite samples to be collected over the entire depth of the excavation. Sidewall sample are generally required to be collected from the same depth interval for composited aliquots.
16. What does the Building Index say about the use for Building 126? Please add that information to the report.

SPECIFIC COMMENTS

1. Page 2-3, §2.3.1 - The work plan and the text in this section requires testing of 100 CY cast piles; however, the table on this page indicates that 150 CY cast piles were tested. Please review and clarify or correct this apparent discrepancy.
2. Page 2-5, §2.3.3.2 - The third paragraph indicates that six bottom samples were collected from B1; however, Figure 2-4 shows only five bottom sample locations. Please review and correct or clarify the apparent discrepancy.
3. Page 2-6, §2.3.3.3 - The sixth paragraph indicates that nine bottom samples were collected from B2; however, Figure 2-5 shows only eight bottom sample locations. Please review and correct or clarify the apparent discrepancy.
4. Page 2-10, §2.3.4.1 - Delete the last sentence in this section; there are no following sections.
5. Page 2-11, §2.3.4.2 - Delete the last sentence in this section; there are no following sections.

6. Page 2-13, §2.3.4.3.2 - The discussion in this section is not clear and does not appear to correspond with the drawings. The location of “Drainage Pipe South” and “VP3” is not shown on the plans and is not apparent.
7. Page 2-13, §2.3.5 - For all test pits please edit the report text to include the area, dimensions, and depth excavated for each test pit.
8. Page 2-21, §2.4 –
 - a. The discussion in this section appears to indicate that only a single TCLP composite sample was used to characterize the 1,325 tons of chemically fixed soil. Normal characterization protocol would require a minimum of three composite samples for a volume this large. Please clarify if this interpretation of what was done is correct. Please also provide details as to how the single composite sample was collected.
 - b. Please identify using sample identification numbers which characterization samples tested positive for lead toxicity. Also, it appears that soil stockpiles that were characteristically hazardous for lead toxicity may have been combined with non-hazardous soil either physically or for sampling purposes. Please clarify if this was done.
 - c. The last paragraph states that approximately 1,325 tons of chemically treated soil was disposed of at the Taunton MA landfill; however, the disposal documentation submitted to Taunton (Appendix F of Attachment A) does not indicate that the waste disposed of there was treated for lead toxicity. Also, the disposal documentation for the Turnkey landfill suggests that some chemically treated soil was disposed of there, although the form was ambiguously completed in this regard and also failed to acknowledge that the soil was from a mandated cleanup site.
 - d. Please provide in the body of this report the results of the post-treatment characterization.
9. Page 4-1, §4.0 –
 - a. In the table on this page please change the description of “RCRA D petroleum contaminated soil” to “RCRA D treated soil contaminated with lead and petroleum”.
 - b. Regarding the table on this page, not all 1,875 gallons of oil and water liquid waste was disposed of at Cyn Oil Corporation. According to the disposal documentation some was shipped to General Chemical Corporation and ultimately disposed of at Environmental Compliance Corporation. Please correct the table.

- c. Please supplement the table on this page, or add a new table, with information identifying the waste characterization samples, the volume of each soil volume characterized using the sample identification, and the ultimate disposition of each volume using the sample identification and waste type description.
10. Table 3-1 - Please clarify why WC-9 through WC-13 are not listed in this table or anywhere else in the body of this report. Also, no analytical data at all were found anywhere in the report for WC-9 through WC-11. No references to WC-9 or WC-10 were found in the report but WC-11 was referenced several times. Please incorporate data for these samples if they exist.
11. Table 3-3 - Please change the TPH heading to DRO as it appears that none of these values include GRO.
12. Drawing 1-2 - Regarding the thick blue line representing drainage piping, please edit the Legend description on this drawing because not all the drainage piping shown was removed.
13. Drawing 2-2 - Please delete as appropriate the edge of pavement (thin blue line) on this drawing because at least a portion of this was apparently an historical feature that no longer existed when this removal action was conducted.
14. Attachment A - Discussion of the soil that was chemically treated to eliminate the lead toxicity characteristic has been consistently referred to in this Attachment as hazardous waste disposed of at a RCRA D facility, which is incorrect. Please revise the Attachment throughout to properly describe the treated waste as non-hazardous, if that is correct based on the post-treatment characterization. If it were hazardous, it should have been disposed of at a RCRA C facility.
15. Attachment A, Appendix A –
 - a. Regarding Area D2 (p. 278 of CD), there are errors in the area designation and at least one sample identification. The information does not properly differentiate between Areas D1 and D2. [See errors on pages 278 [s/b D2 in text], 279 [title and table s/b D2), 280 (100/100 s/b 100/90)].
 - b. On p. 411 of the CD, please correct the typo in the text which erroneously refers to F1 instead of F2.
16. Attachment A, Appendix G - This appendix contains several pages that are unintelligible and need to be copied in a manner to make them legible. Please recopy and resubmit corrected copies.