N62661.AR.002351
NS NEWPORT
5090.3a

RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
235 Promenade Street, Providence, RI 02908-5767 TDD 401-222-4462

20 May 2010

Winoma Johnson, P.E.
NAVFAC MIDLANT (Code OPNEEV)
Environmental Restoration
Building Z 144, Room 109
9742 Maryland Avenue
Norfolk, VA 23511-3095

Comments to:

RE: Draft Proposed Plan
Old Fire Fighter Training Area, Naval Station Newport, Newport, Rhode Island

Dear Ms. Johnson:

The Office of Waste Management at the Rhode Island Department of Environmental Management has conducted a review of the *Draft Proposed Plan*, dated April 2010 for Site 9-Old Fire Fighter Training Area, Naval Station Newport, located in Newport, Rhode Island. As a result of this review, this Office has generated the attached comments on the Proposed Plan.

If you have any questions, in regards to this letter, please contact me at (401) 222-2797, extension 7148 or by e-mail at gary.jablonski@dem.ri.gov.

Sincerely,

Gary Jablonski

Gary Jablonski, Principal Engineer
Office of Waste Management

cc: Matthew DeStefano, RIDEM
Richard Gottlieb, RIDEM
Robert Lim, USEPA Region I
Cornelia Mueller, NETC, Newport, RI
Stephen Parker, Tetra Tech

PP comltr 051210

30% post-consumer fiber

Draft Proposed plan
Site 9- Old Fire Fighter Training Area, Naval Station Newport
Newport, Rhode Island
Dated April 2010

Office of Waste Management's Comments:

1. **Page 1, The Proposed Plan Section; 2nd sentence.**

   "This Plan describes the Navy's proposed remedy for the Site, which, after careful study consists of permeable asphalt/soil cover and land use controls for soils..."

   As per the attached written email correspondence dated 3 February 2010, from Nina Johnson (NAVFAC) to Matthew DeStefano (RIDEM), states the following: *"As discussed this afternoon, Navy agrees to address subsurface TPH contamination that exceeds 2500 mg/kg in two locations: B-9 and SB-512. The TPH contamination in those two locations shall be addressed either by removal, stabilization, or by covering by impermeable surface such as asphalt."* Please change the text in this section from *"permeable asphalt/soil cover"* to *"removal, stabilization and/or an impermeable asphalt cover"* as per agreed upon by Nina and Matthew on 3 February 2010.

2. **Page 2, Scope and role of the Response Action Section; 1st paragraph, 3rd sentence.**

   "The Navy's cleanup evaluation of the Site has concluded with a recommendation for asphalt/soil cover and ...."

   Please refer to Comment 1 mentioned above.

3. **Page 3, Site Background and Characteristics, What was the site used for?; 2nd paragraph.**

   "The site was then converted into a recreational area comprised of a playground, ball field an open pavilion and barbecue grill."

   Please modify the above sentence as follows: *"The site was then converted into a recreational area comprised of a playground, ball field, day care center, an open pavilion and barbecue grill."*

4. **Page 4, Environmental Investigations and Removal Actions; whole section.**

   Please add the following bullets to the this section: 2002 Draft Final Feasibility Study for Soil and Marine Sediment was completed; and 2002 Proposed Plan which call for the removal of all contaminated soils to residential standards and the monitoring of sediments was submitted.

Draft Proposed plan
Site 9- Old Fire Fighter Training Area, Naval Station Newport
Newport, Rhode Island
Dated April 2010

5. **Page 4, 5, What were the investigation results?; whole section.**

Please remove the following italicized statements from the Proposed Plan:

- *"Oil sheens or oil seeps have not been observed in surface water along the shoreline adjacent to the site during any of the documented site investigations."* - During field test pit activities an oil sheen was observed by RIDEM and the Navy's consultant;
- *"PAHs consistent with abraded asphalt were detected in sediment samples from an onsite storm drain and connected up gradient catch basins that discharged to the outfalls along the shoreline site."; and "A forensic study of the sediment contamination was conducted in 2004 and 2008 to clarify the source of the PAHs contaminants. It was found that the PAHs in the sediments were more closely related to PAHs from asphalt and paving then PAHs found in soils at the site."* - To date both EPA and RIDEM have not agreed to these statements;
- *"Studies have shown that manganese and arsenic can occur naturally in the area at elevated concentrations. It was concluded that the metals are most likely components of regional till or bedrock and not a result of contamination."* - The Navy's approved background study for the Site does not state this; and
- *"The comparisons showed similar levels of these contaminants in the mussels collected from the sites and in the reference station."*- To date RIDEM has not accepted this reference station.

6. **Page 5, What were the investigation results?; Metals; 2nd sentence.**

"Elevated levels of lead were associated with fill material (sand & gravel).

Please eliminate the following text from the above sentence in the Proposed Plan: *(sand & gravel).*

7. **Page 6, Step 1- Identify COPCs; 3rd bullet, 1st sentence.**

"Lead, detected at an elevated concentration of 38.6 ug/L, exceeds the federal drinking water criteria of 15 ug/L (and RIDEM drinking water criteria, though it is well within the RIDEM criteria for industrial use).

RIDEM groundwater objectives are not based on land use. Please eliminate the following text from the above sentence in the Proposed Plan: "though it is well within the RIDEM criteria for industrial use".

8. **Page 6, Step 4- Characterize the Risk; whole section.**

Please eliminate the wording "*benchmark*" throughout this section when comparing the risk assessment to RIDEM's Direct Exposure Criteria and Leachability Criteria. RIDEM's Criteria are not benchmarks but actual calculated risk objectives.

9. Page 7, Step 4- Characterize the Risk; 4th bullet, 2nd sentence.

"This scenario is unlikely to occur for the following reasons: the state's groundwater classification of the aquifer underlying the site prevents such use; ..."

Please eliminate the following text from the Proposed Plan: *"the state's groundwater classification of the aquifer underlying the site prevents such use"*. The State's groundwater classification alone does not prevent a drinking water well to be installed. In fact the groundwater classification of GB by the State's Groundwater Classification and Well Head Protection Area is as follows: *"GB - Groundwater resources known of presumed unsuitable for drinking water use without treatment"*. There is nothing in the groundwater classification that prevents an installation of a drinking water well in a GB Classified Area.

10. Page 10, Summary of Remedial Alternatives, Soil alternative 4: whole section.

Please refer to Comment 1 mentioned above.

11. Page 11, Evaluation of Alternatives, Preferred Alternative for Soil, whole section.

Please refer to Comment 1 mentioned above.

12. Page 12, Evaluation of Alternatives, Preferred Alternative for Groundwater, 2nd bullet, 2nd sentence.

"Monitoring would be conducted for 30 years (on a yearly basis for years 1-5 and every five years thereafter) and ...."

Please add the following text: *"at a minimum"*; before *"30 years"* in the above sentence. When waste is left in place at a Site, the standard language for sampling requirements is for sampling to be performed at a minimum of 30-years and at that point the nature of waste and the historical sampling results are reevaluated at that time. Also, please delete the following text from the above sentence: *"(on a yearly basis for years 1-5 and every five years thereafter)"*. Typically, after a site is covered and waste is left in place, the groundwater sampling frequency is quarterly for the first two years followed by a reevaluation of frequency thereafter. The sampling frequency, depending on the historical sampling results and nature of waste left in place, can be petitioned by the site owner for a lesser sampling frequency in the future, if site conditions warrant it.