



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

24 September 2010

Mr. James T. Owens, III, Director
U.S. EPA – New England Region
Office of Site Remediation and Restoration
5 Post Office Square
Suite 100 (OSRR 07-3)
Boston, MA 02109-3912

RE: Record of Decision for Site 9 (OU3), Old Fire Fighting Training Area at Naval Station
Newport, RI

Dear Mr. Owens:

On 23 March 1992 the State of Rhode Island entered into a Federal Facilities Agreement (FFA) with the Department of the Navy and the Environmental Protection Agency. One of the primary goals of the FFA is to insure that the environmental impacts associated with past activities at the Naval Station Newport located in Newport, Rhode Island are thoroughly investigated and that appropriate actions are taken to protect human health and the environment.

In accordance with the FFA, the Department of Environmental Management (Department) has completed its review of the Record of Decision (ROD) for the Site 9 (OU3), Old Fire Fighting Training Area dated September 2010 at Naval Station Newport, RI. The Department of the Navy's selected alternative for the Site, as presented in the ROD, is a geotextile-lined soil and asphalt cover, land use restrictions to restrict groundwater and land use, long term operation and maintenance of the revetment and cover, and long term monitoring of groundwater and sediment.

The Department has worked on this Site with your Agency from the early investigatory stages up through this current decision milestone. Based upon this Department's review of this ROD and the results of the remedial investigation activities conducted to date, we offer our concurrence on the decision.

The Department wishes to emphasize the following aspects of the ROD:

- Placement of a geotextile-lined soil cover over contaminated areas that are not planned for parking. Areas designated for vehicles and parking would be paved with asphalt (if not currently paved) to provide a cover for contaminated soil left in place. As agreed to by the Navy on 3 February 2010, the Navy agreed to address subsurface TPH contamination that exceeded 2500 mg/kg in two locations (B-9 and SB-512) by covering these two areas with an impermeable surface such as asphalt. It is this Department's understanding that these covered areas will be inspected and maintained by the Navy, which includes land use controls to ensure that future use of the property is limited to non-residential activities, and to ensure the soil cover and subsurface soils are not disturbed;

- Surface water control structures will be installed for areas that are paved. These structures will be designed to collect and prevent intrusion of runoff water into the subsurface and direct it to existing or new on Site storm drainage systems;
- It is this Department's understanding that the Navy will implement groundwater use restrictions and a long term monitoring program. The use restrictions would prevent the installation of wells for any consumptive, irrigational, or industrial purpose. Long-term monitoring will evaluate whether Site contamination has migrated to off-shore sediments or to groundwater outside of the compliance boundary for the contamination being managed in place; and
- Navy will conduct five-year reviews to ensure that the remedial actions for the Site continue to provide adequate protection of human health and the environment.

Thank you for providing us with an opportunity to review and concur with this important ROD.

Sincerely,



W. Michael Sullivan, PhD
Director

cc: Terrence Gray, RIDEM
Leo Hellested, RIDEM
Matthew DeStefano, RIDEM
Gary Jablonski, RIDEM
Bryan Olson, USEPA
Robert Lim, USEPA
Winoma Johnson, Navy

ROD RIDEM Conc ltr