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55 Jonspin Road / Wilmington, MA 01887-1020 / 978-658-7899 / Fax: 978-658-7870

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July 2, 1998

Project Number 7574

40974

Mr. James Shafer
Remedial Project Manager
Northern Division, Naval Facilities Engineering Command
10 Industrial Highway, Mail Stop 82
Lester, Pennsylvania 19113

Reference: CLEAN Contract No. N62472-90-D-1298
Contract Task Order No. 0286

Subject: Regulatory Comments to The Draft Final Work Plan, Revision 1
Gould Island - Building 32 and Electroplating Shop

Dear Mr. Shafer:

We are in receipt of the comments to the document referenced above from the EPA and the RIDEM. These comments are dated May 11, 1998 (RIDEM) and May 26, 1998 (EPA).

The RIDEM comments focus on a request for the Navy to implement a Remedial Investigation (RI) at the site. You will recall that we originally proposed to perform an RI at this site, under the assumption that the site was that which was defined as the "Electroplating Shop" and described in the Initial Assessment Study and related documents. Those documents define this site as three rooms in the southeast corner of Building 32. It was our intention to perform a full investigation of that small area and the two outfalls associated with it.

After extensive discussions regarding the definition of the "Site" the Navy has conceded to the RIDEM and the EPA that due to the industrial nature of the activities performed there (torpedo overhaul and degreasing operations), all of Building 32 does merit investigation under the NETC IR program, and the referenced work plan now addresses this building and the surrounding property. However, the status of the of Building 32 is appropriately a study area, and where an RI could be performed in the Electroplating rooms because of the size and historical knowledge of that area, the same cannot be afforded to the remainder of the Building.

Therefore, it is our strongest recommendation that this site be carried forward through investigation and cleanup using the requirements stated in the FFA. The first step in this process is the performance of an SASE for this site, referenced as SA17. If the agencies feel that this is inadequate, the FFA should be revised accordingly.

This issue requires resolution before any further efforts are made on technical revisions to the work plan. Such efforts would not be a useful endeavor at this stage.

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Mr. James Shafer
Naval Facilities Engineering Command
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If you have any questions regarding this issue or any other related material, please do not hesitate to contact me.

Very truly yours,

Stephen S. Parker
Project Manager

SSP/rt

c: M. Griffin, NETC
K. Keckler, USEPA
P. Kulpa, RIDEM
J. Stump, Gannett Fleming
D. Egan, TAG
Restoration Advisory Board
J. Trepanowski/G. Glenn, B&RE
File 7574-3.2

bc: K. O'Neill
File 7574-8.0