



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

January 19, 2007

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

**3690**

Re: Non-Time Critical Removal Action Work Plan for Derecktor Shipyard Sand Blast  
Grit-Impacted Area

Dear Mr. Colter:

EPA reviewed the *Draft Non-Time Critical Removal Action Work Plan for Derecktor Shipyard Sand Blast Grit-Impacted Area*, Naval Station Newport, Rhode Island dated January 12, 2007. This report is a work plan for a follow-up removal action to that completed in 2004 at the location of the north gate and security improvements military construction project. The document is consistent with the Action Memorandum and Engineering Evaluation. Detailed comments are provided in Attachment A.

I look forward to working with you and the Rhode Island Department of Environmental Management toward the cleanup of Derecktor Shipyard. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Kimberlee Keckler".

Kimberlee Keckler, Remedial Project Manager  
Federal Facilities Superfund Section

Attachment

cc: Paul Kulpa, RIDEM, Providence, RI  
Cornelia Mueller, NETC, Newport, RI  
Jennifer Stump, Gannet Fleming, Harrisburg, PA

## ATTACHMENT A

- | <u>Page</u> | <u>Comment</u>   |
|-------------|--|
| §3.2        | This section describes exploratory test pitting to be conducted and states that the “visual results of the test pitting will be used to determine the excavation area.” The statement is made that no additional test pits will be required if no visually observed sandblast grit is encountered. Soil sampling should be conducted to confirm that the soil is within the lead RAO of 150 ppm before deciding not to excavate a given area based on visual observations. |
| §4.3.1      | This section presents the sample identification scheme. The two digits assigned for the base or sidewall should be more clearly identified. How would the two digits identify a confirmatory sample collected from a west sidewall? A specific nomenclature with clear examples could avoid later confusion.   |
| §5.4.3      | Photographs should be taken of the test pits, excavation area, completed site restoration and soil stock piles to document the removal action.   |
| §5.6.1      | The statement is made, “Analytical results and corresponding figures indicating the excavation boundaries will be provided to the Navy and the regulatory agencies for review and acceptance prior to mobilization for the removal action.” Should this sentence state “before demobilization?” The work plan specifies that test pitting will be conducted to identify the excavation boundaries. Therefore, this will not be known before mobilization.                  |
| §5.6.2      | This section describes information to be included in the final report. Please include the volume of soil excavated, the final cost of the removal action, and the date of the final site walkover in the completion report.  |