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LETTER AND COMMENTS FROM U S EPA REGION I REGARDING STUDY AREA 17 CAMP  
FOGARTY MILITARY MUNITIONS RESPONSE PROGRAM DOCUMENTS NCBC  
DAVISVILLE RI  
06/24/2010  
U S EPA REGION I



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**NEW ENGLAND - REGION I**  
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June 24, 2010

Jeff Dale

Dept of Navy, BRAC PMO Northeast  
Code 5090 BPMO NE/JD, 4911 South Broad St  
Philadelphia, PA 19112-1303

Re: Environmental Protection Agency (EPA) Comments on the Camp Fogarty Military Munitions Response Program (MMRP) Documents

Dear Mr. Dale

On June 10, 2020, EPA sent a letter to you proposing the former Navy Rocket Range at Camp Fogarty be added to the FFA as a Study Area. We have not yet heard whether or not you agree; however we have sent you this letter in the interest of moving forward with the investigation of this Study Area.

The Rhode Island Army National Guard (Guard) is the current property operator and has proposed investigation of the former Navy Rocket Range under the MMRP. The Guard has sent EPA the following documents for review: "Draft Site Investigation (SI) Explosives Site Plan (ESP)" dated May 2010, "Phase I Preconstruction Site Assessment for the Proposed U.S. Property and Fiscal Office At Camp Fogarty Training Site, East Greenwich, RI" dated January 2010, and "Amendment of Solicitation/Contract Modification" dated 28 April 2010.

EPA has reviewed these documents and has the following comments:

1. Section 1.2.2, of the DRAFT STATEMENT OF WORK Site Inspection – Military Munitions Response Program Camp Fogarty, East Greenwich, Rhode Island, April 2010, briefly discusses the applicable federal, state, and local laws and regulations that the contractor is responsible for complying with during the implementation of activities required by the SOW. This section should be expanded to more accurately reflect the fact that the proposed MRA is a non-operational range and, as such, should be evaluated and closed-out in accordance with CERCLA/FFA requirements. Although the document "has been prepared as part of the MMRP," the activities required by the SOW must adequately identify, evaluate, and, if necessary, remove and/or remediate all unexploded ordnance (UXO), discarded military munitions (DMM), and munitions constituents (MC) located on site.
2. Table 7-1, in the May 2010, Draft Site Investigation (SI) Explosives Site Plan (ESP), identified the 3.5" Rocket as the "munition with the greatest fragmentation distance" (MGFD) at the proposed

Munitions Response Area (MRA) (i.e., TA-3D). Although the ESP states that the MSD would be recalculated in the event MEC with a greater fragmentation distance is encountered during removal activities, an intrusive, geophysical investigation of the entire TA3D (and adjacent portions of the Safety Danger Zone and TA3C), should be conducted prior to the commencement of any proposed field activities. (The MRA should be redefined to include all three areas.) An instrument such as EM-61 (or equivalent), should be used to identify potential surface and subsurface UXO, MEC, MD, and RRD in the expanded MRA and all anomalies should be investigated intrusively, to a minimum depth of at least 2' beyond the designed depth of the proposed building's foundation. This initial step will ensure that the highest level of precautions have been taken to ensure worker/public safety (prior to the commencement of more intrusive (and potentially more dangerous) field activities), as well as investigate "the presence of projectiles larger than those considered small arms" in the northern portions of TA3C and TA3D (as stated in historical interviews).

3. The soil sampling program discussed in Section 3.4, should be expanded to include the entire MRA (as redefined above). In addition, soil samples should be collected utilizing a "Multi-Increment Sampling" (MIS) approach which has proven to be more effective than traditional grab sampling in satisfying MMRP data quality objectives. (Incremental sampling is a sample collection and processing methodology having specific elements designed to control data variability due to heterogeneity in contaminant distribution, which can be critical to the accurate identification and characterization of munitions constituents in soils.) In addition, Task 3.5 (Section 3.3.3.3) should be expanded to include all potential contaminants of concern, (i.e., munitions constituents) including, but not limited to, explosives, metals, SVOCs, and perchlorate.
4. Aerial photographs and historical site maps should be compiled of the entire Camp Fogarty Training Site, with overlays clearly showing the various changes in property use and more specifically, the construction/alteration of the various rifle, pistol, machine gun, skeet, mortar, and grenade training areas/ranges in existence over the lifespan of the property. The figures should show target and firing points, range fans and impact berms, where applicable.
5. As recommended in Section 5.2.16 of the January 2010, "Phase I – Preconstruction Site Assessment for the Construction of a New U.S. Property and Fiscal Office at Camp Fogarty, Rhode Island Army National Guard," the SOW should be amended to include the surveying (and remediation, if necessary) of the small storage building in the southern portion of TA-3D for asbestos-containing materials (ACM).

EPA would like to schedule either a meeting or conference call to discuss these comments with you, the State, and the Guard at your earliest convenience. Please call me at 617-918-1384.

Sincerely,



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Federal Facilities Superfund Section

cc: Richard Gottlieb, RIDEM  
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