

**NAVY RESPONSE TO
EPA Review of and Comment to the RTC of the Draft Addendum to the Sites 03 and 09
Phase III Work Plan, Offshore Geotechnical Sampling and Confirmation Study at Site 09
(NCBC) and the Final version of the above mentioned report dated July 21, 1997.**

General Comments:

GENERAL COMMENT 1:

The Navy's initial objectives of this Addendum was to: collect geotechnical data for the design of the landfill revetment; collect limited chemical analyses to build upon the existing database; and confirm/verify previous geophysical test results (i.e., buried objects identified in the magnetometer study, and stratigraphy as inferred from seismic reflection study). EPA requested additional objectives be considered including 1) understanding of COC behavior in the harbor environment and identify potential preferential flow paths by analyzing groundwater (porewater) within borings to identify partitioning behavior of contaminants, (essentially elements contained within the 1996 Pre-Design Sampling Plan) and; 2) delineation of contaminated sediment. These objectives were recommended to take advantage of the mobilization of a barge for this investigation in an effort to save time and money.

RESPONSE:

The following objective has been added to the work plan: Continue collection of data to evaluate the potential for a ground-water pathway between the site and the harbor sediment. In accomplishing this objective, the field work would include evaluation of the behavior of constituents, detected in ground-water samples (shallow and deep; refer to Table 2-3 in the revised Final Work Plan Addendum) collected previously from beneath the site, by evaluating the presence of potential preferential flow paths (e.g. offsite extension of the low area in the silt layer surface at MW09-20), by the installation of soil borings and analyzing soil and ground water samples from those borings to assess potential partitioning from ground water to soil/sediment beneath the intertidal zone adjacent to the site.

The analysis of shallow sediment samples to be collected at each boring will assist in the delineation of COC-containing sediment.

GENERAL COMMENT 2:

It appears that the Navy has modified the proposed boring locations to partially address EPA issues concerning the confirmation of preferential flow paths identified during the seismic reflection survey. However, this addendum does not sufficiently address the other objectives EPA requested, specifically efforts related to the 1996 Pre-Design Sampling Plan. With respect to requirements identified in the 1996 Pre-Design Plan, the Navy states that the need for such data (thorough understanding of groundwater impacts to sediment) was eliminated as a result of the selection of the proposed plan (RCRA Subtitle C Landfill Cap). EPA does not agree. The Long Term Monitoring of the effectiveness of the remedy necessitates the knowledge of the locations of the preferential

pathways in order to efficiently monitor the underwater seeps. The Navy states that the majority of EPA's concerns with respect to preferential flow paths will be addressed when the Navy develops the Long-term Monitoring Plan (LTMP) for this site. If the Navy is planning on re-mobilizing for additional investigative efforts during the design and implementation of the LTMP then EPA will agree to wait for the second effort to address requirements of the 1996 Pre-Design Plan.

RESPONSE:

Refer to the response to General Comment 1.

GENERAL COMMENT 3:

Similarly, EPA requested the delineation of contaminated sediment at this time to consolidate investigatory efforts and reduce the time necessary to begin the remedial action. The Navy has stated that they do not intend to include the objective of delineating contaminated sediment with this investigation because they are still evaluating appropriate sediment cleanup criteria. As stated in a July 31, 1996 letter from EPA to the Navy, EPA indicated that the Navy could utilize ERMs, which are less stringent than the ERLs, as sediment criteria. The Navy should reiterate whether they still intend to utilize sediment toxicity testing to establish the sediment criteria.

RESPONSE:

The Navy is currently preparing draft preliminary remediation goals (PRG) for the intertidal sediment. The sampling effort includes collection of sediment samples for chemical analyses, which will assist in delineation.

GENERAL COMMENT 4:

The issue of whether the objectives of the 1996 Pre-Design Sampling Plan are still pertinent to this sampling event is the primary factor for most of the issues associated with this Addendum. This issue needs to be resolved prior to commencing with this investigatory effort. Agreement is necessary on the objectives of this investigation and the development of the LTMP. The majority of issues associated with this Addendum are the result of broadening the scope/objectives of this investigation related to the 1996 Pre-Design Sampling Plan. With respect to the LTMP, it should be confirmed whether or not the Navy intends to perform additional investigatory efforts to identify preferential flow paths or will base their LTMP primarily on data previously collected. If the latter is the case, then the inclusion of analyses for COCs within the sediment/porewater should be performed during this investigation. The requested inclusion of other objectives coupled with the initial objectives requires the collection of a significant amount of analytical, physical, and visual data. Because of the amount of data to be collected, special emphasis should be undertaken to ensure that the objectives are being met and the boring locations are optimized.

RESPONSE:

Refer to the response to General Comment 1. The Navy plans to base the LTMP primarily on data previously collected and data that are collected as a result of implementing this work plan addendum.

GENERAL COMMENT 5:

An evaluation as to whether the subject investigation will achieve the objectives is further complicated by the lack of specific rationale for the proposed boring locations. Further evaluation of the boring locations should be undertaken and specific rationale for each boring included to ensure that each objective is met. An example of appropriate specific rationale is as follows:

SB-2: to obtain geotechnical properties for design of revetment, verify the continuation of the sand layer (preferential flow path) identified in MW-20, and document the continuation, or lack thereof, of VOC contamination identified in MW-20 cluster in shallow and deep zones by collecting chemical analyses of pore water.

In this example, this location is serving to provide data for multiple objectives. It is recommended that the Navy include this type of rationale so that an adequate evaluation can be made.

RESPONSE:

The following rationale will be included in the Revised Final Work Plan Addendum.

SB-1: To obtain geotechnical properties for design of revetment, log stratigraphy for comparison with seismic reflection survey adjacent to the 15 ft tie line between B and C, assess the continuation from the site of the gray silt layer, assess potential presence of a peat layer in the upper 10ft of the sediment, and obtain data (via collection and analysis of sediment/soil and ground-water samples) to aid in assessment of the potential migration from the site of organic and inorganic constituents detected previously in ground-water samples from the site monitoring wells and assessment of potential partitioning of those constituents from ground-water to sediment/soil.

SB-2: To obtain geotechnical properties for design of revetment, verify the continuation of the sand layer (preferential flow path) above the gray silt layer identified in MW09-20, assess potential presence of a peat layer in the upper 10ft of the sediment, and obtain data (via collection and analysis of sediment/soil and ground-water samples) to aid in assessment of the potential migration from the site of organic (particularly from the vicinity of wells MW09-20) and inorganic constituents detected previously in ground-water samples from the site monitoring wells and assessment of potential partitioning of those constituents from ground-water to sediment/soil.

SB-3: To obtain geotechnical properties for design of revetment, assess the continuation from the site of the gray silt layer, assess potential presence of a peat layer in the upper

10ft of the sediment, and obtain data (via collection and analysis of sediment/soil and ground-water samples) to aid in assessment of the potential migration from the site of organic (particularly from the vicinity of wells MW09-09) and inorganic constituents detected previously in ground-water samples from the site monitoring wells and assessment of potential partitioning of those constituents from ground-water to sediment/soil.

SB-4: To obtain geotechnical properties for design of revetment and wetlands, log stratigraphy for comparison with seismic reflection survey adjacent to Station E, assess the continuation from the site of the gray silt layer, assess potential presence of a peat layer in the upper 10ft of the sediment, and obtain data (via collection and analysis of sediment/soil and ground-water samples) to aid in assessment of the potential migration from the site of organic and inorganic constituents detected previously in ground-water samples from the site monitoring wells and assessment of potential partitioning of those constituents from ground-water to sediment/soil.

SB-5: To obtain geotechnical properties for design of revetment, log stratigraphy for comparison with seismic reflection survey near the 15 ft tie line between Stations F and G and in line with a potential buried channel, assess the continuation from the site of the gray silt layer, assess potential presence of a peat layer in the upper 10ft of the sediment, and obtain data (via collection and analysis of sediment/soil and ground-water samples) to aid in assessment of the potential migration from the site of organic and inorganic constituents detected previously in ground-water samples from the site monitoring wells and assessment of potential partitioning of those constituents from ground-water to sediment/soil.

SB-6: To obtain geotechnical properties for design of revetment, log stratigraphy for comparison with seismic reflection survey near the 15 ft tie line between Stations G and H and in line with a potential buried channel, assess the continuation from the site of the gray silt layer, assess potential presence of a peat layer in the upper 10ft of the sediment, and obtain data (via collection and analysis of sediment/soil and ground-water samples) to aid in assessment of the potential migration from the site of organic and inorganic constituents detected previously in ground-water samples from the site monitoring wells and assessment of potential partitioning of those constituents from ground-water to sediment/soil.

SB-7: To obtain geotechnical properties for design of revetment and wetlands, log stratigraphy for comparison with seismic reflection survey at the 30 ft tie line between Stations G and H, and in line with a potential buried channel, assess the continuation from the site of the gray silt layer, assess potential presence of a peat layer in the upper 10ft of the sediment, and obtain data (via collection and analysis of sediment/soil and ground-water samples) to aid in assessment of the potential migration from the site of organic and inorganic constituents detected previously in ground-water samples from the site monitoring wells and assessment of potential partitioning of those constituents from ground-water to sediment/soil.

SB-8: To obtain geotechnical properties for design of revetment, log stratigraphy for comparison with seismic reflection survey near the 15 ft tie line between Stations H and I, assess the continuation from the site of the gray silt layer, assess potential presence of a peat layer in the upper 10ft of the sediment, and obtain data (via collection and analysis of sediment/soil and ground-water samples) to aid in assessment of the potential migration from the site of organic and inorganic constituents detected previously in ground-water samples from the site monitoring wells and assessment of potential partitioning of those constituents from ground-water to sediment/soil.

SB-9: To obtain geotechnical properties for design of revetment, log stratigraphy for comparison with seismic reflection survey near Station I, assess the continuation from the site of the gray silt layer, assess potential presence of a peat layer in the upper 10ft of the sediment, and obtain data (via collection and analysis of sediment/soil and ground-water samples) to aid in assessment of the potential migration from the site of organic (particularly from the vicinity of well MW09-11) and inorganic constituents detected previously in ground-water samples from the site monitoring wells and assessment of potential partitioning of those constituents from ground-water to sediment/soil.

SB-10: To obtain geotechnical properties for design of wetlands, log stratigraphy for comparison with seismic reflection survey at the 100 ft tie line between transects G-G' and H-H' (in the vicinity of a potential buried channel), assess the continuation from the site of the gray silt layer, assess potential presence of a peat layer in the upper 10ft of the sediment, and obtain data (via collection and analysis of sediment/soil and ground-water samples) to aid in assessment of the potential migration from the site of organic and inorganic constituents detected previously in ground-water samples from the site monitoring wells and assessment of potential partitioning of those constituents from ground-water to sediment/soil.

SB-11: To obtain geotechnical properties for design of wetlands, log stratigraphy for comparison with seismic reflection survey along transect E-E', assess the continuation from the site of the gray silt layer, assess potential presence of a peat layer in the upper 10ft of the sediment, and obtain data (via collection and analysis of sediment/soil and ground-water samples) to aid in assessment of the potential migration from the site of organic and inorganic constituents detected previously in ground-water samples from the site monitoring wells and assessment of potential partitioning of those constituents from ground-water to sediment/soil.

SB-12: To obtain geotechnical properties for design of wetlands, log stratigraphy for comparison with seismic reflection survey along transect D-D', verify the continuation of the sand layer (preferential flow path) above the gray silt layer identified in MW09-20, assess potential presence of a peat layer in the upper 10ft of the sediment, and obtain data (via collection and analysis of sediment/soil and ground-water samples) to aid in assessment of the potential migration from the site of organic (particularly from the vicinity of wells MW09-20) and inorganic constituents detected previously in ground-

water samples from the site monitoring wells and assessment of potential partitioning of those constituents from ground-water to sediment/soil.

SB-13: To obtain geotechnical properties for design of revetment, assess the continuation from the site of the gray silt layer, assess potential presence of a peat layer in the upper 10ft of the sediment, and obtain data (via collection and analysis of sediment/soil and ground-water samples) to aid in assessment of the potential migration from the site of organic and inorganic constituents detected previously in ground-water samples from the site monitoring wells and assessment of potential partitioning of those constituents from ground-water to sediment/soil.

SB-14: To obtain geotechnical properties for design of revetment, log stratigraphy for comparison with seismic reflection survey along the 30 ft tie line between transects A-A' and B-B', assess the continuation from the site of the gray silt layer, assess potential presence of a peat layer in the upper 10ft of the sediment, and obtain data (via collection and analysis of sediment/soil and ground-water samples) to aid in assessment of the potential migration from the site of organic and inorganic constituents detected previously in ground-water samples from the site monitoring wells and assessment of potential partitioning of those constituents from ground-water to sediment/soil.

SB-15: To obtain geotechnical properties for design of wetlands, log stratigraphy for comparison with seismic reflection survey along the 100 ft tie line between transects H-H' and I-I', in the vicinity of a potential buried channel, assess the continuation from the site of the gray silt layer, assess potential presence of a peat layer in the upper 10ft of the sediment, and obtain data (via collection and analysis of sediment/soil and ground-water samples) to aid in assessment of the potential migration from the site of organic and inorganic constituents detected previously in ground-water samples from the site monitoring wells and assessment of potential partitioning of those constituents from ground-water to sediment/soil.

GENERAL COMMENT 6a:

The Addendum does not cover the description of the sampling and analysis of the chemical parameters adequately. A separate Quality Assurance Project Plan should be generated for this specific project purpose or the Phase III RI Sites 3, 7 & 9 QAPP could be referenced and used as written and approved. If the QAPP needs to be appended, then it should be appended to include this work. There are many elements of a QAPP as delineated in EPA QA/R-5 that are missing from this Addendum.

RESPONSE:

The handling, preservation, chain of custody, shipping, and chemical analysis of ground-water and soil/sediment samples, and the decontamination of reused field equipment will be in accordance with the revised Final Work Plan Addendum with attached field procedures and the attached QAPP. The collection of ground-water and soil/sediment samples and the handling of investigation-derived waste (Section 2.2 of the Addendum) will be performed in accordance with the Sites 03 and 09 Phase III RI Work Plan (as

stated on page 5 of the Addendum) and as updated by the October 1996 Addendum for sampling at Site 03/Nike.

GENERAL COMMENT 6b:

The fact that this effort is a geotechnical effort does not exclude the requirement for a QAPP. The collection of geotechnical data also has associated QA/QC elements that falls under the QA/R-5 requirements and must be covered. If ASTM Methods are going to be followed to the letter then those methods can be referenced, but the QC for each of those methods should be discussed in this document along with the QC for the chemical methods. Both types of measurements are important to the success of this project.

RESPONSE:

A QAPP has been added. The collection of geotechnical data will be in accordance with ASTM methods and EA protocol (refer to Section 2.1.4 of the Work Plan Addendum). Standard procedures for data collection have been attached to the Work Plan Addendum, which address geotechnical and chemical data collection.

GENERAL COMMENT 6c:

SOPs for sampling, equipment decontamination, sample handling and preservation, sample chain of custody, and sample shipment are a few of the main elements missing.

RESPONSE:

Refer to the response to General Comment 6a.

GENERAL COMMENT 6d:

The areas of data assessment and corrective action if the QC criteria are not met for both chemical and geotechnical testing are also missing.

RESPONSE:

Data assessment and corrective action are discussed in Sections 9 and 10 of the QAPP. If the QC criteria are not met and certain sample results are not useable for the remediation design or ground-water pathway assessment, it will not be used. Currently, the Navy does not plan to remobilize the barge-mounted equipment to collect replacement samples unless insufficient geotechnical data remains for the remediation design.

Final Work Plan Page Specific comments:

SPECIFIC COMMENT Page 3, Section 2.1.2:

The labeling of the lids to sample jars is not a good practice because lids can be switched between sample containers. The self adhesive label should be placed on the side of sample container, filled in with the pertinent information, and covered with water proof clear tape. If this type of label is inappropriate then an alternate approach is the use of a sample tag that is tied around the container neck or is attached to the container in some permanent fashion. Tags can also be separately numbered as a cross check on the sample number and location.

RESPONSE:

It is assumed that this comment actually refers to Section 2.1.3, Page 3. Labeling of the sample containers will include self adhesive labels covered with clear tape. This will be added to this work plan addendum.

SPECIFIC COMMENT Page 4, Section 2.2.1:

The sampling techniques mentioned here should be referenced to SOPs for field collection and/or laboratory sample preparation. The SOP for pore water extraction is especially important. The use of a direct push sampling method for retrieval of a sample must also have an SOP. Any operations outlined in this section must have an associated SOP and the SOPs must be attached to this plan.

RESPONSE:

The sampling techniques are now referenced to the field procedures which have been attached to the revised Final Work Plan Addendum. Soil/sediment samples will be collected using split-barrel sampler in accordance with the Sites 03 and 09 Phase III RI Work Plan. Direct push samples of ground water will be collected using a hydroprobe as was done previously at Site 07, except that: (1) the hydroprobe will be inserted into the borehole when a sample is to be collected and pushed approximately one to three feet beyond the bottom of the borehole at that time, and (2) water samples will be collected with a peristaltic pump using new tubing to collect each sample (the tubing will be placed to the bottom of the probe pipe).

SPECIFIC COMMENT Page 5, Section 2.2.1:

The measurement of headspace volatiles is very important to this project because the volatile compounds may be lost very rapidly during the sample collection and handling operation. The headspace measurements may indicate higher volatile concentrations than the CLP OLMO 3.1 methods will be able to quantitate. Will the headspace measurements be performed using a field GC? What compounds will be investigated/ quantitated in the headspace? Will the same field analytical methods used in the investigation of Site 03 be used? Please clarify.

RESPONSE:

Headspace measurements will be obtained using a PID (Hnu or similar), not a GC like was used previously at Site 03/Nike. With dilutions, CLP OLMO 3.1 methods should be able to quantitate high volatile concentrations as has been done for previous samples collected from Site 09. Additionally, the field measured headspace VOC concentrations have typically been less than that measured in replicate samples sent to an offsite laboratory.

SPECIFIC COMMENT Page 5, Section 2.2.2:

The Naval Facilities Engineering Service Center (NFESC) guidance does not include Region 1 requirements. The number of QC samples collected should follow Region 1 EPA requirements. There should be a table presented that depicts the numbers of samples to be collected and the corresponding number of QC samples for each matrix. A

minimum of 10% QC samples should be collected for the Trip Blanks, Field Blanks, Duplicates, Matrix Spikes, and Matrix Spike Duplicates.

RESPONSE:

The number and type of QC samples has been revised in Table 2-2 of the revised Work Plan Addendum.

SPECIFIC COMMENT Page 6, Section 2.2.3:

The validation of all the data collected, geotechnical and chemical, should be performed. The chemical data collected must be validated following the Region 1, EPA-NE Data Validation Functional Guidelines for Evaluating Environmental Analyses, 12/96. The Data Validation Manual portion of these Guidelines can also be used as a guide to validate the geotechnical data collected during this project.

RESPONSE:

Data validation will be performed in accordance with the December 1996 Functional Guidelines, as requested.

Specific Comments in Response to EPA Comments:**Comment No. 1a:**

EPA requested that the Navy provide a QA/QC plan for the work specified in the Addendum. The Navy responded by placing a discussion of QC samples in the report. This response is not adequate. The report does not include any discussion of decontamination procedures associated with the collection of samples from a barge, QA/QC issues concerning the geotechnical samples to be collected, or specific procedures associated with the collection of groundwater/pore water to ensure representativeness of samples. Even though this report is an addendum to a previously submitted work plan, this addendum should still make reference to this report for the handling of IDW, decontamination procedures, and previously submitted QA/QC plans.

RESPONSE:

Refer to the responses to General Comment 1; Specific Comment Page 4, Section 2.2.1; and the included revised Final Work Plan Addendum, attached field procedures, and QAPP.

Comment No. 1b:

Additionally, the Navy has included a discussion of the types and numbers of QC samples to be collected in Section 2.2.2. The report cites the Naval Facilities Engineering Service Center (NFESC) as the basis for the number of QC samples to collect. The Navy needs to ensure that the collection of appropriate QC samples also meets EPA Region 1 requirements.

RESPONSE:

Refer to response to Specific Comment Page 5, Section 2.2.2.

Comment No. 1c:

Table 2-2 which lists the types and numbers of samples proposed requires further clarification. The table includes a column "Estimated Number of Blanks". It is not clear what this column represents. The table should identify the number of specific QC samples (ie. trip blanks, field blanks, etc.) to be collected as cited in the associated text in Section 2.2.2.1. Section 2.2.2 does not include a discussion of MS/MSD samples. The report needs to include this discussion or refer to other documents developed for this investigation which detail these sampling requirements. Additionally, the report inappropriately refers to equipment rinsate blanks as field blanks. Field blanks, designed to assess atmospheric contamination at the site during the time of sampling, should also be included in this investigation. (See above general comments and page specific comments)

RESPONSE:

The number and type of QC samples has been revised in Table 2-2 of the revised Work Plan Addendum. Equipment rinsate blanks are now referred to as such. Field blanks will be collected at a frequency of once per week, or more frequent if ambient conditions change significantly.

Comment No. 2.

EPA requested that pore water samples be collected and analyzed for salinity, conductivity and COCs. The Navy agreed to sample pore water for salinity and specific conductivity only. The Navy needs to incorporate the collection of pore water at depth for COCs as requested by EPA or indicate that this will be done during a second phase of barge mounted investigations in the Harbor.

RESPONSE:

Refer to the response to General Comment 1 regarding the list of analytical parameters for ground-water samples.

Comments 3 and 4a.

EPA questioned the location of the soil/sediment borings to confirm the results of previous geophysical studies and possible preferential flow paths identified in perimeter monitoring wells (sand layers). The Navy responded that the primary purpose of this addendum was to collect data concerning geotechnical properties of the soil and sediment for suitability evaluation for the wetlands and revetment design and construction. The Navy revised several soil/sediment boring locations in an effort to confirm the potentially buried channels identified from the seismic reflection study. It appears that the identification of the presence or continuation of preferential flow paths has not been addressed in this work plan. EPA expects this issue to be addressed in the second barge mounted investigation phase.

RESPONSE:

Refer to the responses to General Comments 1 and 5.

Comments 3 and 4b.

EPA also requested that specific detailed rationale be provided in an effort to evaluate the appropriateness of the soil/sediment boring locations. The Navy indicated that revised rationale for the soil boring locations were included in Section 2.1.1 and provided some specific rationale for several of the borings in the response to EPA comment 4. However, the rationale provided still appears to lack adequate detail regarding the intended purpose of the boring locations and the suitability of the boring locations to achieve multiple objectives. For instance, the intended purpose of sediment borings SB-3, SB-4, and SB-11 which are in a line perpendicular to the landfill shore is not clearly stated. Additionally, without explanation, the location of SB-1 was moved and SB-14 was added during this revision. Specific rationale should be provided for each boring location to verify/evaluate the suitability of the location to achieve the intended objectives.

RESPONSE:

Refer to the response to General Comment 5.

Comment No. 9.

EPA requested the inclusion of particle size analyses (ASTM D422) to classify the soils per the ASTM engineering classification of soils method (ASTM D2487) which requires both Atterberg Limits and particle size analyses. The Navy has agreed to include particle size analyses at 5 locations. This test is relatively inexpensive and, for proper classification, this test should be performed at all locations where Atterberg limits tests are being performed.

RESPONSE:

The Work Plan Addendum already includes particle size analysis (ASTM D422) for 25 samples. However, the number of samples to be classified by ASTM D2487 has been increased from ten to 25, since ASTM D2487 is relatively inexpensive, and the Atterberg limits and particle size analysis will be available for use in classifying 25 samples.

Comment Nos. 13, 14, 16, 17 and 19.

EPA requested additional investigatory efforts and analyses in order to understand the relationship between contaminated groundwater and harbor sediment. This effort would build upon the base of existing information and be useful in identifying and evaluating long term monitoring points, sample analyses, and frequencies. The Navy response is that this investigation is limited in scope and that a LTMP is currently being developed to address many of the issues. EPA is firmly convinced that additional data is needed in order to produce a sound LTMP and operating properly and successfully determination. The Navy's response suggests a profound disagreement on this issue as Navy is apparently "developing" a LTMP without the benefit of the needed data. Additional data acquisition phases are needed beyond the current geotechnical information in order to support an LTMP which EPA can approve. If the Navy has no objection to re-mobilizing a barge to collect additional data which may be useful in developing the LTMP, then the issue of keeping this investigatory efforts focused on geotechnical issues is satisfactory, with time being the only consideration. If the Navy, objects to re-mobilizing a barge to

collect the additional data requested, then the analytical data requested must be included in this effort.

The specific objectives/scope for the SAIC study should be expanded for review.

RESPONSE:

Refer to the response to General Comment 1.

Comment No. 15.

EPA requested that monitoring wells be sampled to establish baseline conditions and evaluate temporal variations in contaminant concentrations. The Navy does not agree that this is an objective of this investigation. While this may not be directly related to the offshore sampling investigation proposed in this addendum, it still is needed for LTMP development. If the Navy agrees that this will need to be performed to establish baseline conditions, then this activity should be initiated immediately to provide additional data for evaluation.

RESPONSE:

This issue will not be addressed via this Work Plan Addendum.

Specific Comments in Response to RIDEM Comments:

Comment No. 2.

RIDEM requested that the borings be advanced to bedrock. The Navy responded by stating that boring depth will be a function of the loading anticipated from the revetment and wetlands construction. Additionally, the Navy states that chemical sampling will be performed as "convenience allows". The Navy continues to state that the "primary" purpose of this investigation is the collection of geotechnical data. All objectives of this investigation should be considered "primary" including the collection of chemical data.

RESPONSE:

The borings will be advanced to refusal, in order to collect data to meet the objectives discussed in the response to General Comment No. 1.