



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

**received**  
1-12-93

January 6, 1993

Francisco La Greca  
U.S. Department of the Navy  
Northern Division  
10 Industrial Highway  
Code 1823 - Mail Stop 82  
Lester, PA 19113-2090

Dear Mr. La Greca:

Thank you for the opportunity to review the draft "Scope of Work RI/FS Activities - Naval Education and Training Center (NETC), Newport, Rhode Island." Pursuant to § 7.6 of the NETC Federal Facility Agreement (FFA), EPA is providing written comment on this draft primary document. The comments are provided in Attachment A and are organized in a manner that is consistent with the format of the draft document.

Should you have any questions or concerns in regard to the attached, please do not hesitate to call me at (617) 573-5764.

Sincerely,

*Carol A. Keating*

Carol A. Keating  
Remedial Project Manager  
Federal Facilities Superfund Section

Attachment

cc: Paul Kulpa, RIDEM  
Rachel Marino, NETC Newport



ATTACHMENT A

- Page 1, § 1.1, 1st bullet - This text should be revised as follows to more accurately reflect language in the NETC Newport FFA:

"Implement a RI to assess the nature and extent of the threat to human health and the environment caused by the release or threatened release of hazardous substances, pollutants or contaminants at NETC Newport."
- Page 2, § 2.2, ¶ 1 - The November 1989 NPL listing for NETC did not include specific reference to the two parcels of property discussed at the end of this paragraph. The NUWC (former NUSC) property and portions of Gould Island were considered to be part of the NETC Newport solely for the purposes of the FFA (see page 7 of the NETC FFA). Please modify this language accordingly.
- Page 3, ¶ 4 - Since EPA is a party to the FFA, pursuant to which this document is being generated, it is requested that you specifically reference EPA instead of referring to it as an "other regulator."
- Page 6 - Please insert the following language into the chronology of events at NETC Newport:

September 29, 1992 - Record of Decision (ROD) signed by U.S. Navy, RIDEM and EPA for the implementation of an interim ground water pump and treat remedy at Tank Farm Five.
- Page 7, ¶ 2 - Please add the following to the end of the last sentence, "... and are therefore not being addressed pursuant to the terms of the FFA except to the extent that hazardous substances have migrated from NETC Newport to those areas."
- Page 8, § 5.1, ¶ 1 - Please remove Site 02 - Melville North Landfill (MNL) from the list of "NETC Newport sites." The SOW is being generated pursuant to requirements of the NETC Newport FFA of which MNL is not included. The addition of MNL in the discussions of ongoing CERCLA RI/FS activities only serves to confuse the reader and is inappropriate for purposes of the SOW. If the Navy insists on including reference to the RI/FS underway at MNL, mention of this could be incorporated as a separate paragraph after the discussion of MNL on page 5 (see top of page 16 of the NETC Newport FFA for sample language). In addition, EPA is not currently reviewing the Phase II RI/FS Plan for MNL as inferred by the second sentence on page 9. Please amend.

- Page 8, § 5.1 - Although Table 3 sufficiently summarizes the types and number of samples collected during Phase I RI/FS activities, it doesn't give any information with regards to other field activities such as water level measurements, well and elevation surveys, hydraulic conductivity testing, etc. In addition, it makes no reference to the number of ground water sampling rounds conducted and doesn't specify the types of compounds that are analyzed for in the TCL/TAL test methods. Please elaborate on these items and include a brief summary of the results of the Phase I investigation. The SOW should be a stand alone document and as such should include a brief description of findings of earlier investigations.
- Page 8, § 5.0 - This section should include a brief discussion of the interim remedial action (IRA) planned at Tank Farm Five. Much of this discussion can be taken from language in the September 1992 Record of Decision (ROD).
- Page 9, § 5.3, ¶ 1 - Please revise the first sentence as follows to more accurately reflect language in the NETC Newport FFA:

"The objective of the Study Area Screening Evaluation (SASE) investigations are to determine whether a suspected area of contamination poses a threat to human health and the environment in accordance with CERCLA and the NCP."

- Table 3 - For reasons previously stated, please remove reference to Site 02 - Melville North Landfill from this table.
- Page 11, § 7.0 - Consistent with the December 1990 Loring SOW, this section should include a brief discussion of the review process of deliverables, both primary and secondary. (Please refer to §§ 7.2 and 7.3 of the NETC Newport FFA for sample language.)
- Estimated Project Schedule

Pursuant to §§ 7.6(f) and 17.3 of the NETC Newport FFA, the proposed schedule should be modified based on the fact that the final Proposed Plan is released for public comment prior to (development of and) submission of the draft ROD/Responsiveness Summary (RS) for EPA and State review and comment. For purposes of amending the proposed schedule, the following outlines the procedure for Proposed Plan/ROD submission, review and comment, and finalization:

| <u>Action</u>  | <u>Duration</u> |
|--|-----------------|
| Navy submits draft PP  |                 |
| EPA/State review/comment on PP   | 30 days         |
| Meetings held to discuss comments/Navy<br>submits draft final PP                                     | 45 days         |
| EPA/State submit Letter of Concurrence (LOC)<br>w/PP or invokes Dispute Resolution (DR)              | 30 days         |
| Navy issues final PP for public comment or<br>after conclusion of DR                                 | 45 days         |
| Public comment on PP   | 30 days         |
| Navy submits draft ROD/RS upon close of<br>public comment period                                     | 45 days         |
| EPA/State review draft ROD/RS; submit LOC<br>or written comments                                     | 30 days         |
| Navy either:<br>Responds to comments; issues revised ROD or<br>Issues final ROD (if no comments)     | 30 days         |
| EPA/State review revised ROD and either:<br>Issues LOC or<br>Submits letter detailing nonconcurrence | 30 days         |

In addition, it is requested that the Navy add the submission date of the RD/RA Scope of Work to the proposed schedule. Pursuant to § 14.12, the Draft RD/RA SOW should be submitted 120 days after the submission of the Final RI/FS report.