



DEPARTMENT OF THE NAVY

NORTHERN DIVISION  
NAVAL FACILITIES ENGINEERING COMMAND  
10 INDUSTRIAL HIGHWAY  
MAIL STOP, #82

LESTER, PA 19113-2090

IN REPLY REFER TO

5090

Ser 2110/1823/dec

APR 29 1994

**VIA FACSIMILE AND OVERNIGHT MAIL**

Mr. Andrew Miniuks  
Remedial Project Manager  
U.S. Environmental Protection Agency  
Region I  
JFK Federal Building  
Boston, MA 02203-2211

**Re: NOTIFICATION OF NON-COMPLIANCE WITH THE FEDERAL FACILITY  
AGREEMENT FOR THE NAVAL EDUCATION AND TRAINING CENTER,  
NEWPORT, RHODE ISLAND**

Dear Mr. Miniuks:

The purpose of this letter is to respond that the draft Phase II Remedial Investigation (RI) reports were incomplete due to lack of ecological risk assessments.

The Navy is committed to complete the ecological risk assessment in accordance with the Phase II RI work plan for McAllister Point Landfill (Site 01) and the Old Fire Fighting Training Area (Site 09). Work on both of these studies are on-going and draft reports shall be submitted no later than May 30, 1994. We regret the omission of this information at the time the report was submitted.

In support of the Navy's commitment, to complete this task, several significant studies have already been completed at these sites. These studies include the following: a shoreline and off-shore sediment and bivalve contamination assessment (by Battelle Ocean Sciences), a survey of the marine benthic infauna and epifauna environment (by Menzie-Cura & Associates), wetlands delineation (Site 01), leachate generation modelling (Site 01), and a leachate generation ecological risk assessment (Site 01). The results of these studies are included in either the draft Phase II reports, the McAllister Point Landfill 90% cap design submission documents, the draft Leachate Generation, Fate and Transport Ecological Assessment report, and the enclosed draft Marine Benthic Infauna and Epifauna Assessment report.

Work on the complete ecological risk assessments for both of the sites is on-going. The Navy's consultant, TRC Environmental Corporation, is currently compiling all of the completed studies into ecological risk assessments in accordance with the Phase II RI

work plan for the estuarine environment. As part of the decision to cap the landfill, the Navy feels that an ecological risk assessment for the on-shore terrestrial environment at McAllister Point Landfill is no longer needed. In addition, a revegetation plan has been submitted with the 90% design submission for the landfill cap.

The Navy is proceeding with a more focused ecological risk assessment for the sediments offshore of McAllister Point Landfill due to the recent findings. Through the University of Rhode Island's School of Oceanography, a work plan is being developed to conduct the next phase of investigations. Based on discussions during the April 1, 1994 meeting, the Navy anticipates this next phase to propose specialized testing such as toxicity testing, bioassays, and bioaccumulation modeling for a more comprehensive ecological risk assessment. Submission of the draft work plan is estimated to be June 15, 1994.

I would like to reconfirm that the Navy is committed to submitting the ecological risk assessments for both the McAllister Point Landfill and Old Fire Fighting Training Area to complete the Phase II RI reports. As stated previously, complete reports will be submitted no later than May 30, 1994.

If you have questions regarding this matter, please contact me at (610) 595-0567 extension 147.

Sincerely,



*for*  
D. E. CARLSON  
Remedial Project Manager  
By direction of the  
Commanding Officer

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