



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

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

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NAVSTA NEWPORT RI
5090 3a

February 12, 1996

Robert Krivinskas, Remedial Project Manager
U.S. Department of the Navy
Naval Facilities Engineering Command
Northern Division
10 Industrial Highway
Code 1823, Mail Stop 82
Lester, PA 19113-2090

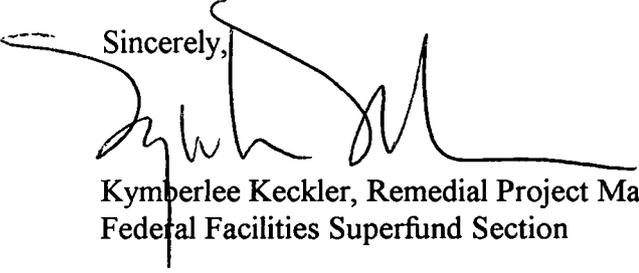
Re. Study Area Screening Evaluation ("SASE") Work Plan

Dear Mr. Krivinskas:

As discussed, I am writing to you concerning the Response to EPA Comments on the Draft Study Area Screening Evaluation ("SASE") Work Plan (dated December 13, 1995), the Draft Final Study Area Screening Evaluation ("SASE") Work Plan, and the minutes from the January 18, 1996 meeting. Overall, EPA is pleased that most of the comments were correctly incorporated into the text of the Draft Final SASE Work Plan (dated September 1995). However, several minor clarifications may be necessary as discussed below. EPA recognizes that the "amended" responses (indicated by underlined text) were not included in the Draft Final SASE Work Plan because they were made subsequent to the submittal of the Draft Final SASE Work Plan. Detailed comments are provided in Attachment A and the page number refers to the specific page that the response can be located.

I look forward to working with you on the Final SASE Work Plan for Derecktor Shipyard. Please do not hesitate to contact me at (617) 573-5777 should you have any questions

Sincerely,



Kimberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: Paul Kulpa, RIDEM, Providence, RI
Brad Wheeler, NETC, Newport, RI
Bob DiBiccaro, USEPA, Boston, MA
Susan Svirsky, USEPA, Boston, MA
Mary Pothier, CDM, Boston, MA
Steven Parker, Brown & Root, Wilmington, MA

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ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. 3, Response to third comment	The comment states that samples in the South Waterfront Area (discussed on page 3-1) should be added to determine whether this area should be retained as an area of concern. The response concludes that the test pits planned for the South Waterfront Area are described in Section 3.3.1.1 and Figure 3-1. The correct reference is Figure 3-2 which shows the proposed locations of the test pits. Figure 3-1 is a figure of the detail of the protective cover for Cleaned Sump.
p. 3, Response to fourth comment	The comment states that soil piles referenced in Section 3.3.1.1 should be depicted on Figure 3-1. The figure should now be Figure 3-2.
p. 4, Response to fifth comment	The comment states that a well should be installed along the south waterfront in the area with the highest level of contamination based on test-pit screening data. The response states that no wells were planned for the south waterfront as part of the SASE because the material in this area is piled fill, placed on the beach. It is concluded in the response that if site conditions warrant, a well can be added as a field modification. It is not apparent that this response was incorporated into the text of the Draft Final SASE Work Plan.
pp. 5 & 6, Response to fifth comment	The comment states that analysis of all boreholes should include a surface soil sample (0 to 1 foot), and a subsurface soil sample (1 to 10 feet) selected according to highest contaminant concentrations. The response indicates that soil samples were not planned because most of the boring locations are paved, but to accommodate concerns of future land use, surface soil samples will be collected from the 0-1 foot interval. However, in cases where the surface soils come in contact with asphalt, the top 2-4 inches of the soil column will be extruded from the sample to minimize impact by SVOCs from the asphalt pavement. This procedure must be incorporated into the Final SASE Work Plan. This should also be corrected in the minutes from the January 18, 1996 meeting.
p. 9, Response to fourth comment	The response indicates that the samples will be collected in VOC vials, maintained at 4°F, and analyzed within the allowed holding time to insure representativeness. However, the Draft Final report indicates that the samples will be collected in VOC vials, and maintained at 4°C, which is correct. This should also be corrected in the minutes from the January 18, 1996 meeting.

pp. 13 & 14,
Response to
fourth comment

The comment was made in regard to using the most recent version of HEAST FY-1994 Annual. The Navy concurred and indicated the most recent version of all documents available would be used as appropriate. However, the Draft Final SASE Report references the document as HEAST FY-1993 Annual. The Final SASE Report should be updated as appropriate.

pp. 14 & 15,
Response to
Appendix C

A comment was made about the need to clarify "room temperature." The response concludes that the term "room temperature" actually refers to a temperature-controlled environment. This is achieved by use of an air conditioned or heated trailer, in a separate room isolated from foot traffic and normal entrance/exit. Also the response states that the field office where screening will be performed will be regulated between 20°C and 28°C, either via heat or air conditioning. These requirements regarding room temperature must be addressed in Appendix C and the text of the Final SASE Work Plan.