



TETRA TECH

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Project Number 112G02422

Ms. Winoma Johnson, PE
Remedial Project Manager
NAVFAC MIDLANT
9742 Maryland Avenue
Norfolk VA, 23511-3095

Reference: CLEAN Contract No. N62472-03-D-0057
Contract Task Order No. WE50

Subject: Final RPM Meeting Notes and Summary November 18, 2009
NAVSTA Newport, Newport Rhode Island

Dear Ms. Johnson:

Attached for your records are the Final Notes and attachments that summarize the RPM meeting held for the NAVSTA Newport IR Program on November 18, 2009, for the IR sites at NAVSTA Newport.

If you have any questions on this material, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Stephen S. Parker', with a long horizontal flourish extending to the right.

Stephen S. Parker, LSP
Project Manager

SSP/lh

attachments

- c: K. Keckler, USEPA (2, w/encl.)
- P. Kulpa, RIDEM (2, w/encl.)
- C. Mueller, NAVSTA (2, w/encl.)
- B. Lim, USEPA (2, w/encl.)
- G. Lombardo, USEPA (Elec. Only)
- J. Trepanowski, TtNUS (w/encl.)
- G. Glenn, TtNUS (w/o encl.)
- Site File (c/o Glen Wagner, TtNUS Pittsburgh (w/encl.)
- File G02422-3.2 (w/o encl.) File G02422-8.0 (w/encl.)

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MEETING NOTES
RPM MEETING NOVEMBER 18, 2009
NAVSTA NEWPORT IR PROJECTS

Attending:

Aaron Bernhardt Tetra Tech (by phone)
Jennifer Corack, NAVFAC (by phone)
Chris Deacutis, RIDEM (by phone)
Todd Finlayson, Gannett Fleming (by phone)
Jim Forrelli, Tetra Tech
Winoma Johnson, NAVFAC
B. Hoskins, USEPA (by phone)
Paul Kulpa, RIDEM (by phone)
Robert Lim – USEPA
Ginny Lombardo, USEPA
Cornelia Mueller, NAVSTA
Stephen Parker, Tetra Tech
Lee Ann Sinagoga, Tetra Tech
Chau Vu, USEPA (by phone)

Attachments:

A – Proposed revisions to the McAllister Long Term Monitoring Program

Meeting convened at 0915

Old Fire Fighting Training Area

Bob Lim stated that the EPA believes that a ROD in fiscal year 2010 is possible, and asked if everyone could work toward that goal. Bob noted that the FFA schedule extension request from the Navy dated October 2009 had been received and reviewed, but EPA questioned the dates in the letter. W. Johnson stated that the Navy felt that there were still issues in the FS that RIDEM does not agree with, and by not resolving these, will prevent the Navy from meeting a final ROD in FY 2010. These include the alternatives that were presented, and other show stopper issues.

P. Kulpa stated that RIDEM felt that some technologies are not addressed fully in the recent version of the FS, and also that RIDEM does not concur with some of the cost estimates. In particular, phytoremediation was not fully evaluated in the document.

Bob Lim asked whether the phytoremediation would address CERCLA or non-CERCLA contaminants. Paul responded that they both could be addressed. B. Lim noted that the Navy provided a recent submittal from EPA that described the reasons that phytoremediation was not included in any of the alternatives, and asked if RIDEM was satisfied with that submittal. P. Kulpa stated that RIDEM felt that the Navy's information was dated. B. Lim asked if RIDEM felt that phytoremediation would address soil or groundwater contamination. P. Kulpa stated that he was not certain what would be better addressed, but noted that the point is that the RIDEM required another active remediation in place for the site, and only conducting an excavation to 30,000 mg/kg TPH is not going to be acceptable. B. Lim stated that RIDEM needs to clarify their requests regarding the FS, and that they need to be focused on the CERCLA issues. RIDEM needs to consider the ramifications of their comments and delays to the process by dragging in the non-CERCLA issues into the FS.

P. Kulpa stated that phytoremediation will address CERCLA and non-CERCLA contaminants. In particular, phytoremediation will remove SVOCs. He also stated that this issue needs to be

discussed further. B. Lim stated that the Navy provided the backup information on phytoremediation, and asked if RIDEM has responded. P. Kulpa again stated that the Navy's reference information on the topic is dated and is not completely sufficient.

Revetment:

B. Lim stated that EPA has submitted comments to the Navy on the Draft Work Plan for construction of the replacement stone revetment. P. Kulpa stated that he provided his copies to his water resources office for review and will check on the progress of their review. Bob asked if Paul could do that soon, and Paul responded that he would.

Note, the Navy has received concurrence from the Coastal Resources Management Council for the revetment.

Action:

RIDEM to check progress of Water Resources office review of the Draft Work Plan for the Revetment

NUSC

W. Johnson began discussions on Building 179 area at NUSC. She stated that the Navy has addressed soil at Building 179 through soil removals conducted along with the concrete underground storage tank (CUST) remediation in the late 1990s. RIDEM correspondence does not show that they were not in agreement with cleanup actions conducted on site soil. P. Kulpa stated that he would check into his correspondence records for issues on this. G. Lombardo stated that documentation on the 1999 report is lacking and does not demonstrate that there is no risk. Discussions were suspended until J. Forrelli could support the discussion.

Action: RIDEM to review correspondence on the soil removal at Building 179 during the late 1990s.

McAllister Point

S. Parker stated that the Navy is proposing to prepare a Technical Memorandum to document a change to the frequency of the different elements for the long term monitoring program at McAllister Point Landfill. This would be conducted in accordance with Section 7.9 of the FFA which describes the process to alter a final document. The Technical Memorandum would be prepared as a draft and would allow for a 45 day review period, after which the it would be provided as final. The alterations would include the items described in the Five Year Review Report and the 2008 Long Term Monitoring Reports (reference Attachment A). G. Lombardo requested that the the Technical Memorandum state simply what document is being updated, and what the changes are. G. Lombardo stated that EPA was in agreement with these changes, and asked if RIDEM was in agreement. P. Kulpa stated that RIDEM concurs with the reduction in landfill gas screening, but is concerned with spikes in the landfill gas sampling and analysis. S. Parker noted that the landfill gas sample results all showed concentrations below all criteria, and therefore, most of these perceived spikes are non-existent. . G. Lombardo asked if the AALs are not exceeded, could RIDEM "see" reducing the frequency. P. Kulpa stated that RIDEM would consider this and comment on the Technical Memorandum. W. Johnson noted that RIDEM did not choose to comment on the reports where the recommendations were made for the reductions in the monitoring efforts, but is now indicating that they may comment on the document that revises the scope of the long term monitoring programs. W. Johnson stated that the Navy will prepare the monitoring plan addendum and submit it for review as planned.

Action:

Navy to prepare/provide work plan addendum to revise LTMP at Site 1.

Role of the Natural Resources Trustees

W. Johnson stated that she is uncertain what the official involvement of the natural resources trustees are for NAVSTA. G. Lombardo stated that it is her understanding that NOAA is involved with the IR sites that have coastal locations and a marine sediment component. Apart from that, she was not sure what official arrangements there are. B. Lim agreed that he was uncertain of any formal arrangements. G. Lombardo also noted that USF&W contacted her in reference to the Carr Point site as it is a former shooting range and they requested copies of documents for this site. W. Johnson stated at that time that she would provide documents to USF&W. However, based on communication from K. Keckler pertaining to a different site, it was provided that EPA no longer has an Interagency Agreement with the Trustees. G. Lombardo stated she would discuss with K. Keckler and review any official arrangements for the Navy.

Action:

**Tetra Tech to provide Draft SI to Ken Munney, USF&W (completed 11/23/09).
EPA to follow up with Navy on official arrangements with trustees (completed 11/24/09).**

NUSC Disposal Area

J. Forrelli recapped the recent submittals and outstanding action items.

- A Bernhardt sent minutes from the teleconferences on the ecological issues.
- Tetra Tech submitted a summary of Building 185 (EPA and RIDEM both received).
- Regarding Action Item No. 16, Response to EPAs Comment No. 32, bullets need to adequately represent the ecological issues that are carried forward to the FS. This item was tabled until Bart could get on the phone.
- The Draft Final RI will be issued by the end of November.
- Outstanding RIDEM action item is the groundwater contours: RIDEM stated that they would send groundwater contour analysis based on their Comment No. 50. P. Kulpa stated that the maps are in the mail already.

G. Lombardo asked if there were any further issues from RIDEM that were unresolved. P. Kulpa stated that any issues likely would be resolved with new data from the Supplemental RI. He also stated that the new wells that will be installed will help the interpretation of the contours. There was general agreement that there was no need for additional revisions to the RI prior to submittal.

Regarding Building 185, J. Forrelli stated that summary documentation was provided based on the comments from EPA dated July 9. Navy provided responses on September 16 and EPA provided follow-up comments on October 7. Based on these submittals, the Building 185 summary was prepared.

A records search at NUWC provided additional information on which a summary of the background of Building 185 was prepared. J. Forrelli provided a brief description of the summary document. G. Lombardo requested additional borings and samples within all four Building 185 structures regardless of the structures status as actively operational. The following items were discussed on this topic.

- There are no records of releases in Structures 2, 3, or 4.
- The Navy agreed to further investigate and sample soil under Structure 1.
- Structures 1 and 2 previously had drains that have been sealed.
- Structure 4 has a floor drain that is a blind drain – it drains to compacted gravel under pavement.
- There are no records or observations of drains from structure 3.

P. Kulpa asked if there was a spill report from Structure 1. J. Forrelli stated that one is not recorded. The notification from 2004 was a discovery of a past release, no report of the release was found. However, upon discovery, notification was made to RIDEM.

G. Lombard stated that additional research is useful and important however, the continued use as an active facility plays no part in the role the Navy now has regarding cleanup. Records going back to 1992 don't eliminate releases that may have occurred prior to that date.

W. Johnson stated that EPA should consider that Structures 2 and 4 show no records as used for hazardous materials. Structure 3 is not currently used for hazardous materials, and only at Area 1 is a hazardous materials release documented. G. Lombardo stated that CERCLA covers the threat of release and all structures should be partially or solely responsible for downgradient contamination. W. Johnson requested that EPA provide a letter on the Building 185 additional sampling, and G. Lombardo stated that it is not necessary because the EPA had already provided their position in writing to the Navy when the additional sampling was requested. G. Lombardo also stated that EPA could compromise on the number of sample locations within each of the four areas, but they couldn't ignore them completely.

Regarding the October 7 clarification of the discharge location from the drains originating at Structure 1, RIDEM requested that the RI should state that it is unknown where the discharge occurred. J. Forrelli stated that logic would suggest that sample station 134 is the location of the former discharge from Structure 1 based on the piping present on the ground surface. RIDEM stated that this just needs to be clarified.

Action: Navy to follow up on these questions in the supplemental investigation and RI. RIDEM to provide their interpretation of groundwater contours.

Building 179 Further discussion:

J. Forrelli recapped the site history;

- Explosion in facility in 1990s, part of building needed to be rebuilt.
- During restoration a concrete underground quench tank was closed, soil was removed from the building area and from the tank area
- Foster Wheeler prepared two closure reports: Building 179 remedial action report, and a UST closure report.
- Soil samples were collected on grids, Grids No. 1-18 were sections of soil under the building – data has been located.
- Grid 19 was associated with the tank – data has not been located, though the report summary states 11 samples were taken and none exceeded RIDEM industrial/commercial criteria.

J. Forrelli provided a handout on the summary of the supplemental investigation, this includes analysis for PGDN which is the primary component of Otto Fuel.

G. Lombardo stated that she expects to see something in the revised RI that demonstrates and documents all the soil data from this area. However, she also stated that EPA would like to see more soil data from that area as part of the supplemental investigation. She also requested 1,4, dioxane in the supplemental investigation.

G. Lombardo stated that Bart and Todd need to provide concurrence on the redline text that Aaron sent on the 17th. Bart noted that at first glance, it looks like Aaron explained everything they requested.

Carr Point Draft SI Report

S. Parker introduced the highlights of the Draft SI, noting that preliminary comments had been received from USEPA, and that he had discussions with RIDEM staff reviewing the document and therefore it was evident that both parties were familiar with the document. He also referred them to a presentation file provided the previous week. S. Parker and W. Johnson explained that the site would be divided for future work – The firing range currently used by Morale Recreation and Welfare will be continued under the Munitions Response Program (MRP) and the storage areas will be continued under the IR program as “Site 22 – Carr Point Storage Area”. All parties agreed that the sites should be carried forward to another investigation phase.

W. Johnson explained that there is no Munitions Response Program funding for this site in 2010, and therefore limited work can be conducted on the north portion of the site this year.

The draft comments from USEPA were reviewed. It was recognized early that many of the comments were comments to the scope of the RI that would be done in the future, and not on the scope of the current investigation.

There was some discussion about the terminology used in the SI report. It was determined that the term “possible risk” was a misnomer, and it was clarified that the screening process in the SI step only identifies compounds that could pose “potential concern”. The Risk Assessment in the RI will determine risk to receptors.

There was agreement with Comments 2 and 3, and noted that these were comments on the scope of the RI.

Regarding Comment 22, it was requested that the ecological assessment and screening steps be consistent with other sites in Newport.

Regarding Comment 23, it was noted that PAHs should not be dropped out at the SI stage, though it may be appropriate to do so at the RI stage, if the data and assessments support it.

Regarding Comment 24, there needs to be some supporting information on dropping pesticides from the evaluations. EPA requests a response on this issue.

B. Hoskins stated that overall, EPA will expect the RI to fully evaluate ecological risk from all chemicals that exceed benchmarks or were otherwise identified as COPCs in the SI report. There was general agreement on this statement, since it is within the risk protocols.

(At this point, B. Hoskins, A. Bernhardt dropped off the call)

Regarding the human health portions of the SI, it was noted that Section 6 did not contain enough detail, and even though it is only a Site Investigation, a table of summary statistics for each of the sampled media should be provided as was done for Section 7. These tables should show RSLs for soil and RSL tapwater values in addition to MCLs for groundwater. S. Parker agreed to provide this in the revised document.

C. Vu noted that the COPC screening was not done for Human Health against sediment data collected. S. Parker stated that all the sediment data was collected at stations that were under more than one foot of water. The meeting notes record that C. Vu stated that RSLs are typically used for sediment although they can be adjusted using a multiplier (10x?) to compensate (for reduced exposure). EPA later clarified that it is their policy to compare intertidal sediment data directly to RSLs at other Federal Facilities Superfund Sites.

She further stated that there is no need to compare the sediment data under water more than 1 foot deep to human health criteria, but for the RI, they will expect the intertidal sediment and soil above the tide line to be compared in this manner.

Regarding Comment 8, EPA requested that the SI conclusions do not dismiss metals as a potential concern.

Regarding Comment 10, it is unclear in the document that the relative absorption factor (RAF) (which originates from Massachusetts DEP) is only noted as an uncertainty, or if we plan to use it. L.A. Sinagoga stated that there is evidence that the PAHs are from the skeet (clay targets) and there is technical basis for inclusion of the RAF. C. Vu stated that you can include it in the RI but in the uncertainty section, and it will be necessary that the RI show what the risk would be if the RAF was not included. It should not be used in the SI screening steps (EPA does not think it is appropriate because they do not know how MADEP developed it), and because PAHs are known to be very toxic to early life exposure. J. Corack pointed out that there is a difference between toxicity for exposure and toxicity after exposure. C. Vu requested that they both be presented.

Regarding Comment 32, EPA requested that the summary sections 6 and 7 pull in all the COPCs inclusively, and that they are all reflected for clarity.

Risk Evaluation for the Carr Point RV Camping Area

C. Vu stated that EPA had conducted a review of the risk evaluation for the former firing areas currently used as the RV Camping area, and stated that EPA requests a summary table set showing the input values to this summary. A RAGs D table set will be sufficient. Tetra Tech stated that this material can be provided.

The following points were clarified:

- The 14 day exposure duration is based on actual use of the campground as relayed by the Navy's MWR office. P. Kulpa pressed this issue, asking what would prevent campers from leaving and returning for another two weeks later in the season. S. Parker stated that only the campground policy would prevent this from happening.
- The five year exposure is based on anecdotal discussions from the MWR office regarding returning customers.
- The worker exposure is based on a single individual coming to mow the grass at the site and collect rent from the campers.

G. Lombardo suggested that the Navy consider doing a Time Critical Removal Action for the high concentrations of PAHs at the site, but recognized that some analysis will need to be done to determine resulting risk after removal from sub areas.

P. Kulpa requested records of conversation or emails from the MWR representative. W. Johnson stated she is not comfortable providing personnel info outside the Navy, and RIDEM should consider herself or Cornelia the source of the information, if that is what he needs.

G. Lombardo stated that the SI report should be finalized so that the site can move forward as quickly as possible. She also stated that she did not feel that the data or the risk evaluations as provided are adequate to assure protectiveness to continued use of the site.

Action Items:

Navy to provide response to comments on the SI report and submit a draft final document.

The meeting adjourned at 3:45 PM.

November 18, 2009

**Proposed Plan
Long Term Monitoring Work Plan Addendum
McAllister Point landfill,
NAVSTA Newport**

Document/Item	Start	Finish
Prepare / Submit Draft Technical Memorandum summarizing documents with suggested revisions under Section 7.9 of the FFA	1/29/10	2/19/10
Regulatory Review	2/19/10	4/5/10
Concurrence on	4/5/10	4/5/10

Outline of Monitoring Work Plan Addendum:

- OU 1 – Source Control
 - Landfill Gas Real Time Monitoring
 - LEL/Methane, Co2, %O2, H2S, reduce to annually, during summer months when emissions are highest.
 - Landfill Gas & Ambient Air Sampling
 - VOCs, SVOCs, Methane, Total Hydrocarbons, reduce to once every five years.
 - Groundwater
 - Annually, reduce to eight wells, SVOCs, dissolved metals, total metals, during spring when groundwater is high.
 - Inspections – Semiannually and after storm events.
 - Fence
 - Roads
 - Vegetation
 - Cap
 - Storm Drains
 - Settlement Survey – Annually.

- OU 4 – Marine Sediment – All Monitoring Station Groups, Frequency reduced to Five Year Cycles:
 - Sediment Chemistry – PAHs, PCB-Cs, metals, AVS/SEM, TOC.
 - Porewater – Total metals.
 - Sediment Toxicity – Leptoichirus 28 day test.
 - Porewater Toxicity – Ampelesca 48 hour test.
 - Biota – Metals, PAHs, PCBs, Lipids.

Highlights indicate revisions to sampling program