TETRA TECH

C-NAVY-07-09-3251W

July 28, 2009

Project Number 112G00632

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. 065

Subject: Final RPM Meeting Notes and Summary May 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 May 18, 2009.

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

Very truly yours,

James R. Forrelli

James. R. Forrelli, PE
Project Manager

JRF/lh

attachments

c: C. Mueller, NAVSTA (2, w/encl.)
B. Lim, USEPA (2, w/encl)
P. Kulpa, RIDEM (2, w/encl.)
S. Parker, TtNUS (Elec. Only)
T. Sword, Agvid (Elec. Only)
J. Trepanowski, TtNUS (w/encl.)
G. Glenn, TtNUS (w/encl.)
AR (c/o Glen Wagner, TtNUS Pittsburgh (w/encl.)
File G00632-3.2 (w/o encl.) File G00632-8.0 (w/encl.)

Tetra Tech NUS, Inc.
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Tel 978.474.8400 Fax 978.474.8499 www.ttnus.com

Meeting Notes
RPMs Conference Call, May 18, 2009
NAVSTA Newport, Newport Rhode Island

Attachments:

1. Agenda
2. Shoreline Soil Sample Total Petroleum Hydrocarbons Results, Old Fire Fighting Area (table)
3. Figure 1, Revised Proposed Revetment Plan and Sample Location – West OFFTA
4. Figure 1, Revised Proposed Revetment Plan and Sample Location – East OFFTA

Participating:

Stephen Parker, Tetra Tech NUS, Inc.
James Forrelli, Tetra Tech NUS, Inc.
Winoma Johnson, NAVFAC
Paul Kulpa, RIDEM
Bob Lim, USEPA
Taylor Sword, Agviq Environmental Services

The meeting convened at 1:00 PM

1. OFFTA

a) Petroleum

W. Johnson opened the discussion by stating that the Navy sent via email an alternate plan to address the TPH contaminated soils beneath the footprint of the proposed revetment. To address RIDEM's concerns, the Navy is proposing to remove petroleum contaminated soils exceeding a total petroleum hydrocarbons (TPH) level of 2,500 mg/kg encountered within the footprint of the new OFFTA stone revetment during construction.

J. Forrelli briefly reviewed the figures and a table that accompanied the Navy's plan. Figures 1 and 2 show the revised proposed revetment footprint and the TPH soil sample locations while the table provides the corresponding TPH results. All the soil sample locations with results exceeding 2,500 mg/kg are located along the east section of the proposed revetment (Figure 2).

B. Lim asked if the Navy planned to also sample for SVOCs during the revetment construction. W. Johnson replied that samples would only be analyzed for TPH. W. Johnson emphasized that the construction contractor (Agviq) is desperately waiting to get to the field and that once this issue is decided, the work plan providing the sampling details will be submitted.

P. Kulpa advised that he would check with RIDEM management for approval of the 2,500 mg/kg TPH action level. He asked if there are SVOCs and metals exceedances at

the revetment sample locations. S. Parker advised that this information could be found in the Pre-Design Investigation Report. W. Johnson advised that the Navy needs a response from the state on this proposal soon.

B. Lim advised that EPA has no concern with SVOCs and metals as there will be no direct contact and that land-use controls will likely be in place. P. Kulpa stated that RIDEM has not agreed to nor rejected a cap and environmental land use controls for the site, adding that RIDEM prefers a more active remedy.

B. Lim stated that the FS addresses both CERCLA and non-CERCLA issues creating misunderstandings, Prior agreement has been to include petroleum. P. Kulpa observed that the previous FS and proposed plan presented petroleum as a COC and proposed soil removal to 500 mg/kg TPH. S. Parker noted that PAHs drove the previous plan.

B. Lim asked if petroleum is the only contaminant for the portion of the site south of Taylor Drive. S. Parker replied that contaminants there also include PAHs and lead.

B. Lim stated that he understands the Navy intends to meet Superfund and state requirements, including petroleum. There are two scenarios for the proposed plan and ROD; 1) addresses only CERCLA contaminants, and 2) addresses CERCLA contaminants plus state requirements. W. Johnson agreed that the Navy would decide whether limit the FS to CERCLA or address TPH also. The Navy will provide a response to that question.

B. Lim stated that RIDEM has been commenting on CERCLA and non-CERCLA issues. P. Kulpa noted that PAHs and lead are issues but that TPH is an issue also.

B. Lim stated that with proposed LUCs the state is not losing control based on the way the Navy has responded to comments. He suggested a separate call between EPA and RIDEM to discuss this issue, with the Navy listening in. P. Kulpa advised there is a comment regarding the state's ability to enforce land use controls. P. Kulpa stated that the Navy needs to say in writing that the State of Rhode Island has ability to enforce land use restrictions. W. Johnson advised the ROD will stipulate how the LUCs are implemented. A discussion followed concerning which Rhode Island petroleum regulations include ELUR provisions to prevent exposure to humans. B. Lim offered to hold a call with RIDEM and the EPA attorney to discuss these concerns.

B. Lim asked what would be the offset for the portable dam when in placed. T. Sword replied it would be placed to avoid eel grass, about the same location as indicated previously for the 100 percent design.

Action: RIDEM to respond to Navy proposal to remove TPH contaminated soils exceeding 2,500 mg/kg beneath the revetment footprint.

Navy to notify EPA and RIDEM if OFFTA FS will be limited to CERCLA or addresses TPH also.

b) Groundwater Standards

B. Lim referred to the EPA comment presented in the agenda that states Rhode Island state groundwater regulations do not apply. He stated that MCLs are ARARs. W.

Johnson raised the issue of soil leachability criteria based on Rhode Island's groundwater classification. J. Forrelli asked if there would be any qualifications on MCLs as the standard given the use of groundwater at OFFTA as a drinking water source is unlikely. B. Lim replied that given the soil cap is likely, MCLs would only have to be met at the site perimeter and not within the site footprint. B. Lim stated that as this EPA policy will affect OFFTA, Derecktor Shipyard, and NUSC Disposal Area sites, additional discussion involving all of the EPA RPMs is warranted.

Action – EPA to schedule a follow-up call to discuss application of EPA policy of MCLs as groundwater standards at NAVSTA Newport sites.

c. Sediment

B. Lim reviewed the differing views regarding OFFTA site sediment, stating that first the Tiger Team did not believe sediment dredging was a good response. S. Parker added that the Tiger Team found there was not enough information to support dredging. B. Lim added that secondly RIDEM did not agree with the conclusions of the forensics study conducted to determine the source of PAHs in the sediment. S. Parker advised that the forensics study showed there are off-site sources contributing to PAHs in the sediment.

B. Lim asked if sediment needs to be part of the FS. He stated that since sediment monitoring is being conducted at McAllister Point LF site, it would likely be done at OFFTA. S. Parker advised that OFFTA site sediment risks are low for PAHs and arsenic and that there were PAH releases from site but also from multiple off-site sources. EPA's position in past was that monitoring is not protective.

B. Lim stated that based the discussion the FS should continue to address sediment but he would need to review the need to address the sediment given the RAOs and the PRGs.

P. Kulpa suggested that while the portable dam is in place for the revetment construction sediment should be excavated and disposed of at a landfill. B. Lim asked if this sediment excavation would obviate the need for monitoring. S. Parker noted that in the past the parties could reach agreement on the extent of sediment removal. W. Johnson advised that Navy would not address sediment at this time, stating that CERCLA is a phased program, and that the Action Memorandum s directing the process.

2. TANK FARMS

W. Johnson stated that the Tanks Farm 4 and 5 should be addressed by both petroleum and CERCLA programs. S. Parker stated that if the CERCLA areas of the tank farms are closed out the remaining areas could be addressed as petroleum sites with the state. He reviewed the decision areas presented in the QAPP based on the release locations, suggesting that the decision units should be reviewed to decide if CERCLA or state petroleum regulations apply. He listed various CERCLA units and petroleum units at Tank Farms 4 and 5. B. Lim agreed this would be a good approach given the OFFTA experience. P. Kulpa advised that this approach would have to account for every source. S. Parker stated that Table 2-1, which lists each source, could be revised to add a column for the applicable regulatory program, state petroleum or CERCLA. P. Kulpa suggested that this approach would result in removing the tank farms from the CERCLA program and removal from the FFA. W. Johnson disagreed, noting that the FFA is not

specific as to decision units. P. Kulpa stated that he would discuss the proposed approach with RIDEM management.

Action: RIDEM to respond to Navy proposal to close out specific decision units at Tank Farms 4 and 5 under CERCLA first and close out the remaining release areas under Rhode Island petroleum regulations.

Meeting adjourned at 3:10 PM.

Draft Agenda
Conference Call 5/18/09 1:00 – 4:00

Phone Number:	**1-866-270-2016 (US Toll Free)**
Meeting ID:	**097483**
Meeting Password:	**8434**

Discussion Topics

OFFTA –

1) Petroleum

"While a discussion of remediation of TPH under State authority may be retained in the text, it should not be included in any of the analysis of CERCLA alternatives under the NCP criteria. It should not be included in calculating the CERCLA risk at the site. The bullets in this section (1.8.6 of the FS) should be moved into a separate section or removed". (see R. Lim e-mail 4/23/09)

2) Groundwater

"Rhode Island does not have federal authorized groundwater standards, therefore federal standards are to be used for remedial actions within the CERCLA site. The state groundwater regulations are not ARARs, instead MCLs are the relevant and appropriate standards." (see R. Lim email 4/23/09)

3) Sediment (see General Comment 3, and specific comments 8, 47, and 49 in the EPA comment letter 4/15/08)

TANK FARMS (Time Allowing) –

1) Petroleum vs CERCLA programs
   a. CERCLA:
      i. Tank Farm 4, Decision unit 1
      ii. Tank Farm 5, Decision unit 2
   b. Petroleum (State)
      i. Tank Farm 4, Decision units 3a, 3b
      ii. Tank Farm 5, Decision unit 4c

SHORELINE SOIL SAMPLE TOTAL PETROLEUM HYDROCARBONS RESULTS
OLD FIRE FIGHTING TRAINING AREA
NAVSTA NEWPORT, RHODE ISLAND

Sample locations are listed from west to east; for locations see:
Figure 1 - Revised Proposed Revetment Plan and Sample Locations - West OFFTA
Figure 2 - Revised Proposed Revetment Plan and Sample Locations - East OFFTA

Location ID	Surf. Elev. (feet)	Sample Interval (feet bgs)		Sample Interval Bottom Elev. (feet)	Total Petroleum Hydrocarbons - Analytical Laboratory (units: mg/kg)		Total Petroleum Hydrocarbons - Petroflag® Analyzer System (units: mg/kg)	Comments
SB-415	13.3	0	2	11.3	370			
		0	2	11.3	140	duplicate		
		0	2	11.3	255	average		
		2	4	9.3	470			
		6	8	5.3	13 U			
		10	12	1.3	39			
SB-405	7	2	4	3	43			
		6	8	-1	92			
		10	12	-5	13 U			
		10	12	-5	13 U	duplicate		
		10	12	-5	13 U	average		
		14	16	-9	13 U			
SB-406	11.4	0	2	9.4	36			
		6	8	3.4	170			
		10	12	-0.6	69			
		14	16	-4.6	17			
		14	16	-4.6	13 U	duplicate		
		14	16	-4.6	11.75	average		
		18	20	-8.6	13 U			
SB-407	12.9	0	2	10.9	92			
		2	4	8.9	190			
		8	10	2.9	48			
		12	14	-1.1	900			
		16	18	-5.1	23			
		20	22	-9.1	13 U			
		20	22	-9.1	13 U	duplicate		
		20	22	-9.1	13 U	average		
B-8					--			
SB-508					--			
SB-400	7.3	0	2	5.3	16			
		6	8	-0.7	170			
MW-11S					--			
SB-427	8.3	2	4	4.3	370			
		6	8	0.3	400			
B-5					--			
MW-11S					--			
SB-428	8	2	4	4	1700			
		6	8	0	290			
		10	12	-4	56			
		14	16	-8	13 U			
		18	20	-12	12 U			
MW-102	8.3	6	8	2.3	***8200*** J			
SB-429	8.6	4	6	2.6	***2600***			
		6	8	0.6	***8200***			
		6	8	0.6	***7800***	duplicate		
		6	8	0.6	***8000***	average		
		10	12	-3.4	250			
		14	16	-7.4	15 U			
		18	20	-11.4	15 U			
TP-15	9	5	6	3	***NA***			21000 mg/kg TPH - removed by B1 excavation

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B1-B0		0	0.5		--	319	collected from end of B1 Pipe
B1-B1	9	9	9	0	--	2028	excavation base sample
B1-B2	9	9	9	0	--	900	excavation base sample
B1-B3	9	9	9	0	--	2148	excavation base sample
B1-B4	9	9	9	0	***4470***	2227	excavation base sample
B1-B4D	9	9	9	0	1570	2428 duplicate	excavation base sample
B1-B5	9	9	9	0	--	2212	excavation base sample
B1-S1	9	4	9	0	--	400	excavation sidewall sample
B1-S2	9	4	9	0	--	765	excavation sidewall sample
B1-S3	9	4	9	0	--	438	excavation sidewall sample
B1-S4	9	4	9	0	--	1754	excavation sidewall sample
MW-2D					--		
MW-2S					--		
B2-B0		0	0.5		***5520***	2312	collected from inside end of B2 pipe
B2-B1	9.5	9.5	9.5	0	--	1771	excavation base sample
B2-B1A	9.5	10.5	10.5	-1	--	***3140***	excavation base sample
B2-B2	9.5	9.5	9.5	0	76.6	335	excavation base sample
B2-B3	9.5	9.5	9.5	0	--	1835	excavation base sample
B2-B4	9.5	9.5	9.5	0	2310	1920	excavation base sample
B2-B4A	9.5	10.5	10.5	-1	659	***EEEE*** beyond range	excavation base sample
B2-B4B	9.5	11.5	11.5	-2	--	***7635***	excavation base sample
B2-B5	9.5	9.5	9.5	0	--	1741	excavation base sample
B2-OF01	9.5	0	0.5	9	--	389	sediment Area B2 outfall
B2-OF02	9.5	0	0.5	9	***3070***	1950	sediment Area B2 outfall
B2-OF03	9.5	0	0.5	9	--	1690	sediment Area B2 outfall
B2-S1	9.5	4	9.5	0	--	1040	excavation sidewall sample
B2-S2	9.5	4	9.5	0	--	1403	excavation sidewall sample
B2-S2D	9.5	4	9.5	0	--	1105 duplicate	excavation sidewall sample
B2-S3	9.5	4	9.5	0	--	1620	excavation sidewall sample
B2-S4	9.5	4	9.5	0	--	1861	excavation sidewall sample
B2-S4A	9.5	4	10.5	-1	2330	***EEEE*** beyond range	excavation sidewall sample
B2-S4B	9.5	4	11.5	-2	--	***9155***	excavation sidewall sample
SB-404	8.9	2	4	4.9	66		
		6	8	0.9	***8800***		
		10	12	-3.1	2100		
		16	18	-9.1	13 U		
		18	20	-11.1	17 U		
B-16					--		
SB-504	10.1	4	6		31.3		
		8	10		***3761***		
TP-14	10	3	4	6	***4800***		
SB-430	9.8	2	4	5.8	330		
		8	10	-0.2	***2800***		
		12	14	-4.2	290		
		14	16	-6.2	13 U		
MW-10S					--		
B-3					--		
SB-414	10.7	2	4	6.7	110		
		6	8	2.7	180		
		10	12	-1.3	1200		
SB-431	11.1	2	4	7.1	50		
		8	10	1.1	2300		
		10	12	-0.9	***3200***		
TP-05	11	7	8	3	40 U		

SHORELINE SOIL SAMPLE TOTAL PETROLEUM HYDROCARBONS RESULTS
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SB-426	11.5	2	4	7.5	35			
		2	4	7.5	41	duplicate		
		2	4	7.5	38	average		
B-16					--			

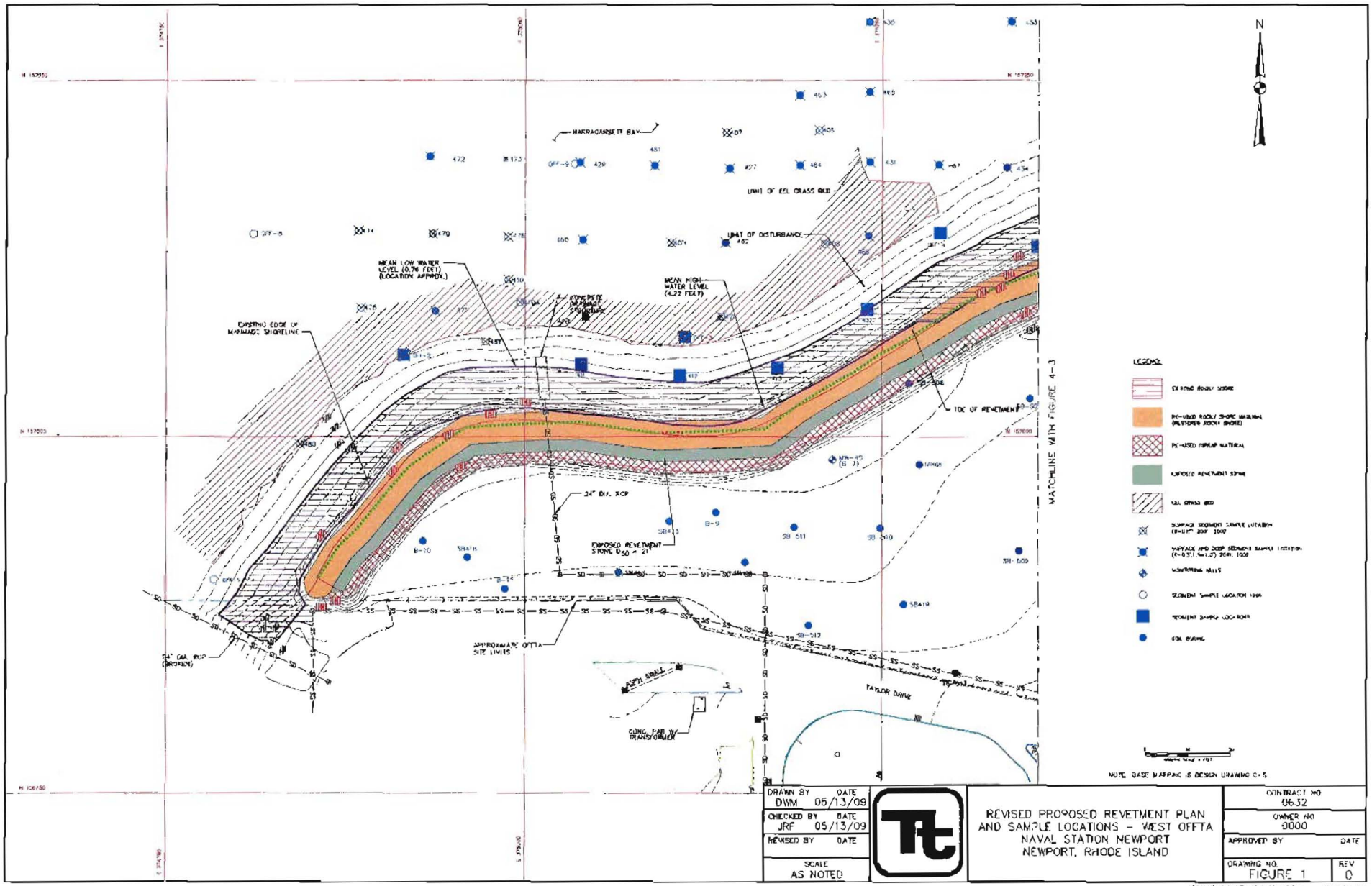
Notes:

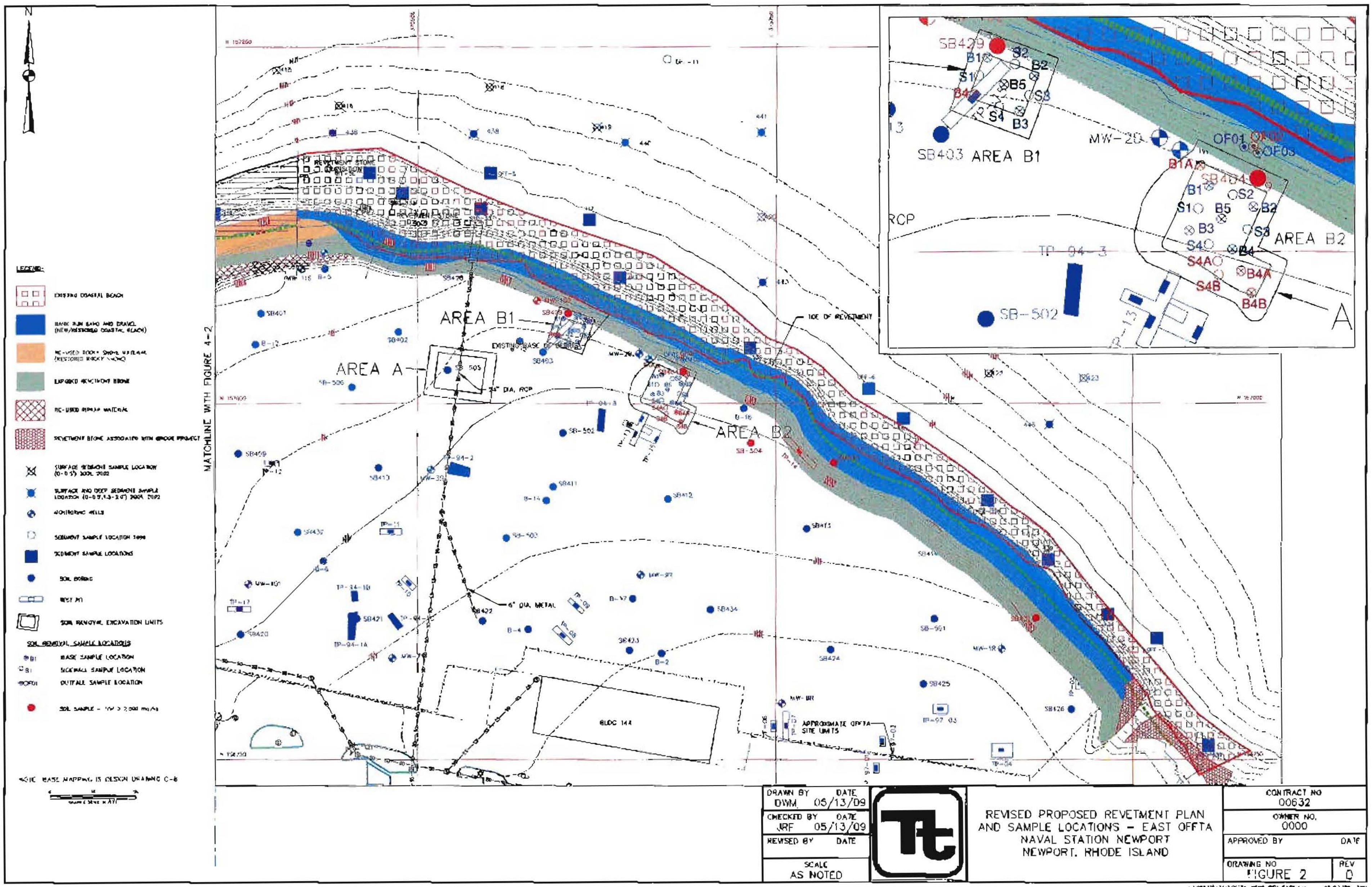
bgs	below ground surface
J	estimated
mg/kg	milligram per kilogram
--	not analyzed for TPH
NA	not applicable
U	not detected
EEEE	Petroflag field screening result beyond instrument range.
TPH	total petroleum hydrocarbons

Surface elevations presented in feet NGVD 1929 (MLW); italicized elevations estimated

Petroflag® Analyzer System testing was used to field screen B1 and B2 excavation confirmation samples for TPH. Ten percent of all field screening samples were analyzed through laboratory analysis to confirm Petroflag TPH measurement.

Bolded/italicized values exceed RIDEM 2,500 mg/kg industrial/commercial direct exposure TPH criteria


N
MATCHLINE WITH FIGURE 4-3
NOTE: BASE MAPPING IS DESIGN DRAWING C-5
DRAWN BY DWM DATE 05/13/09
CHECKED BY JRF DATE 05/13/09
REVISED BY DATE
SCALE AS NOTED
REVISED PROPOSED REVETMENT PLAN AND SAMPLE LOCATIONS - WEST OFFTA NAVAL STATION NEWPORT NEWPORT, RHODE ISLAND
CONTRACT NO 6632
OWNER NO 0000
APPROVED BY DATE
DRAWING NO. FIGURE 1
REV 0


N
LEGEND:
EXISTING COASTAL BEACH
SOIL BORING
SOIL REMOVAL EXCAVATION LIMITS
BASE SAMPLE LOCATION
SIDEWALL SAMPLE LOCATION
OUTFALL SAMPLE LOCATION
MATCHLINE WITH FIGURE 4-2
AREA A
AREA B1
AREA B2
24" DIA. RCP
6" DIA. METAL
TOE OF REVETMENT
BLDG 144
APPROXIMATE OFFTA SITE LIMITS
SB429
SB403 AREA B1
MW-20
OF01
OF03
B1A
SB404
AREA B2
TP-94-3
SB-502
RCP
A
DRAWN BY DWM DATE 05/13/09
CHECKED BY JRF DATE 05/13/09
REVISED BY DATE
SCALE AS NOTED
REVISED PROPOSED REVETMENT PLAN AND SAMPLE LOCATIONS - EAST OFFTA
NAVAL STATION NEWPORT
NEWPORT, RHODE ISLAND
CONTRACT NO 00632
OWNER NO. 0000
APPROVED BY DATE
DRAWING NO FIGURE 2
REV 0