



TETRA TECH

C-NAVY-09-08-2891W

September 17, 2008

Project Number 112G00632

Ms. Winoma Johnson, P.E.
Remedial Project Manager
NAVFAC MIDLANT (Code OPNEEV)
Environmental Restoration
Building Z-144, Room 109
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 July 16, 2008
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 July 16, 2008.

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

Very truly yours,

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.)
- P. Loht, Gannett Fleming (1, w/encl.)
- G. Lombardo, USEPA (2, w/encl.)
- J. Trepanowski, TtNUS (1, w/encl.)
- G. Glenn, TtNUS (1, w/encl.)
- Admin Record, c/o B. Capito NAVFAC (1, w/encl.)
- File 0632-3.2 (w/o encl.) File 0632-8.0 (1, w/encl.)

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Meeting Notes
RPMs Meeting, July 16, 2008, 3:00 PM
NAVSTA Newport, Newport Rhode Island

The meeting convened at 3:00 PM

Attachments:

1. Agenda
2. RPM Document Tracking Sheets dated 7/13/08
3. Summary Response to Comments, McAllister Long Term Monitoring Round 4
4. Summary Response to Comments, McAllister Annual Monitoring For 2007
5. Draft Summary of Response to comments, Gould Phase 2 RI SAP
6. Map of Water Depths at Sediment Stations, Gould Island

Present:

Tom Campbell, Tetra Tech NUS, Inc.
James Colter, NAVFAC
Winoma Johnson, NAVFAC
Paul Kulpa, RIDEM
Ginny Lombardo, USEPA
Cornelia Mueller, NAVSTA
Stephen Parker, Tetra Tech NUS, Inc.

Jim Colter introduced Winoma Johnson, PE who will be taking over Newport IR from NAVFAC. Jim will be taking a new job in Philadelphia in September 2008. There will be a formal announcement on this, and in the meantime, he asked that correspondence continue to go to his attention.

Derecktor Shipyard

Discussions were held earlier in the day on Derecktor Shipyard with a larger group, refer to the record of teleconference for that meeting.

Gould Island

T. Campbell noted that Tetra Tech had prepared a draft response to comments on the Draft SAP for Phase 2 RI. T. Campbell provided a draft summary of comments/responses (attached). He noted that there were several comments that would require discussion. These included:

- Moving sediment samples closer to shore
- Adding shoreline or soil samples at Buildings 50, 54, and 38
- Which reference location to use, Jamestown Potter Cove or Jamestown Cranston Cove
- Addition of Cytochrome p450 tests to indicate shellfish exposure to PAHs
- Other risk assessment related issues

Paul Kulpa requested water depths be provided for the areas where sediment samples would be collected. However, firm bathymetry has not been recorded for this site yet, but a map was marked up with water depths at stations where samples were already collected (provided attached to these notes).

It was agreed that the discussion should be held prior to response. Paul Kulpa requested that he be allowed to schedule Chris Deacutis' attendance prior to scheduling this discussion.

ACTION ITEMS:

- Paul Kulpa to provide times that RIDEM is available for call on Draft QAPP**
- Jim Colter to follow up with K. Keckler on the same items.**
- Jim Colter to schedule conference call.**

Tank Farms 4 and 5

Data Gaps Assessment

J. Colter stated that the draft QAPP for data gaps assessment at Tank Farms 4 and 5 is in internal review, which will require minimum four weeks. It will be provided as soon as possible to the regulators.

Treatment Building

J. Colter stated that the Navy has decided to move forward with the demolition of the Treatment Building and system at Tank Farm 5. He noted RIDEMs concern with the loss of the systems availability for other projects, but he stated that the Navy cannot put that structure in the Navy's inventory and maintain it. IR projects that need water treatment can get portable systems for whatever they need. Demolition bids are expected next week, and the project will move ahead.

ACTION ITEMS:

- Tetra Tech to Provide ID QAPP to Navy**
- Navy to review ID QAPP and Provide Comments to Tetra Tech**
- Tetra Tech to Publish QAPP**

OFFTA

Soil Removal Action

S. Parker stated that a hiatus was needed for the removal action for contracting reasons, and the remaining test pits were planned for early August. S. Parker will provide notification to the interested parties when the schedule is finalized.

Feasibility Study

S. Parker noted that Tetra Tech had received RIDEMs comments on the Revised Draft FS, and he was working through those comments. RIDEMs comment in the cover letter was noted in particular. RIDEM noted that the FS addresses the site without removal of the soil, and the next version of the FS should incorporate that information. RIDEM intends to treat the next version of the FS with that revision as a draft document (paraphrased). J. Colter asked what the impacts were from the removal action, S. Parker

clarified that the soils removed during the removal action probably account for less than 10% of all the soil addressed in the FS that exceeds the PRGs (the soil removal action was a hot spot removal). J. Colter stated that after all the comments had been thought through, the Navy would need to meet with RIDEM and the EPA and find a path forward.

Revetment

S. Parker noted that a preliminary 90% revetment design had been completed and submitted to the review parties. Jim Colter stated that the RFP had been provided to the Navy's small business RAC contractor to implement this design. However, he noted that Ken Anderson at Rhode Island CRMC had contacted the Navy and stated that the state is ready to issue a consistency determination, but wants to provide a contingency that "all soil" under the revetment footprint be removed. After some discussion, it was determined that this meant all soil exceeding state criteria should be removed. There was a brief discussion about applicability of these criteria in this situation (soil, sediment, deep soil, non-vadose zone soil, etc). J. Colter asked if it was appropriate to make contingencies in this manner, Paul Kulpa stated that the State should have the right to require this. He also stated that RIDEM prefers the revetment construction be held until the FS is completed, so that there is no need to remove a portion of it, if additional soil removals are required later. J. Colter stated that RIDEM's concerns about soil will be met with the eventual ROD.

Action Items

- **CRMC will issue a consistency determination for the revetment**
- **Navy will receive bids for revetment construction**
- **Navy's contractor (Agviq) will prepare a work plan for revetment construction**
- **Tetra Tech to Schedule remaining test pit excavations on shore.**
- **Tetra Tech will prepare response to comments on the FS**

McAllister Point Landfill

J. Colter passed out the responses to comments on Round 4 Long Term monitoring and the 2007 annual report for McAllister. G. Lombardo asked if landfill gas readings could be compared with anything. Jim said he would pass this on to ECC. G. Lombardo stated that the responses to the Round 4 report would be passed on to the risk assessors. G. Lombardo also requested that the Round 5 LTM sampling schedule be provided to them. Her concern is that the Round 5 data will be instrumental in the five year review report, which is due as a Draft by June 2009.

Action Items

- **J. Colter to provide schedule for Round 5 to EPA**
- **EPA to review responses to comments**
- **E-Core / ECC to provide landfill gas comparison criteria in the revised report.**

NUSC

S. Parker stated that the follow-up groundwater well installation and sampling was going to commence next week. Geophysics in the paved areas is under way now, and the Navy is moving the equipment with the fork lifts as well as they can. G. Lombardo asked

if any of the comments she had provided on the proposal for additional wells were a problem. S. Parker did not believe so (as a follow-up the Navy agreed to include the additional drilling footage and analyses requested by EPA's comments).

G. Lombardo also asked if weekly updates could continue now that the field work is continuing, S. Parker agreed to follow up with that. In particular, she wanted to be sure Bart Hoskins could watch the fish sample collection when it was conducted.

G. Lombardo requested installation logs for wells installed at the site and up gradient to the south of the site from existing wells. This was a previous request that had not yet been completed. S. Parker stated he would follow up with this.

G. Lombardo noted that the Draft RI was due in January 2009, and wants to be sure that the date is met. In addition, she requested a summary of findings of the additional wells in the NAPL area to determine how that information will affect the RI.

Action Items:

- **Tetra Tech to provide weekly updates on field work until it is complete.**
- **Tetra Tech to provide well logs for the wells installed around MW100B and those up gradient of the site**
- **Tetra Tech to follow up with the additional wells with a summary of findings for this area. This may follow with a conference call or a discussion at the September RPM meeting.**

Carr Point

S. Parker stated that a response summary was drafted for the QAPP for Carr Point, but there were a few issues to discuss.

T. Campbell noted the request for analysis of soil samples using method 8330B. G. Lombardo clarified that EPA requests the use of the ASTM method 8330B for testing for energetics and propellants on the soils near the firing points, not in the sediments down-field. She further clarified that the sampling approach described in the method should be considered for the metals analysis in the firing fan area. J. Colter and W. Johnson stated that currently, there is no Navy-approved lab for conducting the preparation work that is required by this method. G. Lombardo stated that the EPA is willing to entertain a compromise approach for the SI, but EPA will require this method analysis for an RI step.

Another comment requests analysis of PAHs in the sediments in the firing fan. J. Colter stated concern that PAHs in the sediment that are present from non-point sources would be incorrectly attributed to the targets which do contain some PAHs. G. Lombardo suggested a subset of the sediment samples be analyzed for PAHs. G. Lombardo suggested a literature search for PAH data in Narragansett Bay be conducted for comparison purposes. J. Colter stated he would discuss internally prior to releasing the response to comments.

T. Campbell stated RIDEM comments also request investigation of a number of structures including oil water separators which they have record of being present at the site. S. Parker asked where they were, and P. Kulpa stated that he had seen Navy

drawings showing these features. After some discussion it was agreed that the Navy would search records for these features, and note whether they had found them. These additional structures are not part of the shooting range portion of the site. Jim Colter suggested the possibility of splitting the site into two sites, the shooting range area and the storage areas.

ACTION ITEMS:

- Navy to discuss draft responses to comments to Carr Point QAPP
- Navy to review use of Method 8330B for energetics and propellants analysis
- Navy to review drawings of Tank Farm 4 areas and Carr Point Areas for features of interest.

Melville Water Tower

S. Parker stated that the final removal action work plan was completed and sent out. G. Lombardo stated that so far it looked good; there may be some minor comments.

G. Lombardo asked about the lead model that was agreed to be done. S. Parker stated that the draft report which he had in hand shows acceptable blood-lead predictions for residential and trespasser scenarios using all combinations of surface and depth data. The report will be provided to the Navy for review and submitted accordingly.

G. Lombardo stated that she had not received follow up plan from the previous meeting regarding the property boundaries. S. Parker stated that he had received a plan, though it was not clear from the markings the distances between corner points. C. Mueller stated that the GMH lease had just been signed and she could send around a legal description of the boundaries.

ACTION ITEMS:

- Navy to review blood lead model for Melville Water Tower
- Tetra Tech to submit to regulators for review
- Navy to provide legal description of the property boundaries of the former water tower site

Basewide Background

J. Colter noted that the final Base-wide background report is complete and submitted.

Meeting adjourned at 6:35pm to attend the RAB.

AGENDA
RPMs MEETING 7/16/08
BUILDING 1 NAVSTA NEWPORT 3:00 PM

Technical Discussion Topics:

For each topic please be prepared to make decisions and resolve issues.

- 1 Derecktor**
 - a. Update on Marine Sediment FS
 - i. Response to Comments – Cost Comment
 - ii. Other Responses needing follow-up
 - iii. Schedule for final document
 - b. Update on On-Shore Path Forward
- 2 Gould Island**
 - a. Comments/Responses to Draft BERA Work Plan (QAPP)
- 3 Tank Farms 4 and 5**
 - a. Draft Sampling & Analysis Plan (QAPP)
 - b. Schedule for Dismantling Treatment Building at Tank Farm 5
- 4 OFFTA**
 - a. Update on Revetment Design
 - b. Update on Revised FS
 - c. Removal Action update
- 5. McAllister**
 - a. Comments/Responses to Draft Round 4 Marine Sediments Monitoring Report
 - b. Comments/Responses to Annual Monitoring Report, O&M Activities 2007
- 6. NUSC Disposal Area**
 - a. Progress on RI Field work
- 7. MRP Site 1 Carr Point**
 - a. Update on response to comments and revised QAPP
 - i. Method 8330
 - ii. Composite Sampling
- 8. Melville Water Tower**
 - a. Update on Completion Report
 - b. Update on Lead Model
- 9. Other Items**
 - a. Basewide Background Report Finalized

NAVSTA NEWPORT
RPM DOCUMENT TRACKING AND 3-MONTH SCHEDULE PROJECTION

Revised: 7/15/2008 SSP

SITE	ACTIVITY	PLANNED DUE DATE	AGREED-ON DATE	ACTUAL DATE	FFA DURATIONS	COMMENTS
Site 1 McAllister Point	LONG TERM MONITORING 2003 (ECC)					
	Final 2003 Report	1/10/2004	NA	10/1/2004		
	LONG TERM MONITORING 2004 (ECC)					
	Final 2004 Report (Air and Groundwater)	1/10/2005	NA	1/10/2005		
	LONG TERM MONITORING 2004 (Marine Sed) (TNUS) - ROUND 1					
	Final 2004 Report (Marine Sediment)	9/5/2005	NA	3/9/2006		
	LONG TERM MONITORING WORK PLAN (Incorporates LFGas, GW and Marine Sed) (TNUS)					
	EPA corresp on draft LTM work plan	NA	NA	8/31/2005		
	RIDEM Corresp. On draft LTM work plan	NA	NA	9/6/2005		
	Final LTM Work Plan	10/18/2005	10/18/2005	10/18/2005		
	RIDEM Notice to enter dispute on LTM Work Plan	NA	NA	11/14/2005		
	Navy response to RIDEM letter	NA	NA	1/6/2006		States that addendum paragraphs will be provided, but that RIDEM does not have jurisdiction on LTM completion
	Draft Addendum to the Final LTM work plan	---	---	1/8/2007		RIDEM Letter 3/19/07 - Need discussion
	Final Addendum to the Final LTM work plan	TBD	---			RIDEM and Navy in disagreement over LNAPL
	LONG TERM MONITORING for 2005 - Air and Groundwater (ECC)					
	Final LTM Report for 2005	5/3/2006		4/18/2007		Draft Report misplaced due to closure of EPA NE office in June 2006. Report finalized and submitted with 2006 Draft Report
	LONG TERM MONITORING Marine Sediment 2005 (ECC) - ROUND 2					
	Draft LTM Marine Sed report for 2005	2/28/2007		4/18/2007		Draft Report misplaced due to closure of EPA NE office in June 2006. Report finalized and submitted with 2006 Draft Report
	LONG TERM MONITORING for 2006 - Air and Groundwater (ECC)					
	Draft LTM Report for 2006	2/28/2007		4/18/2007		
	Comments from Regulators	6/2/2007		5/24/2007	45 days after submission of draft document	EPA - 5/17/07, NOAA - 5/24/07, RIDEM - Not Commenting
	Comment Resolution	7/17/2007		8/21/2007	90 days after submission of draft document	Discussed at RPM Mtg of 7/18/07 - Add'l info requested. Navy response sent 8/21/07.
	Final LTM Report for 2006	8/31/2007		12/12/2007	135 days after submission of draft document	
	LONG TERM MONITORING Marine Sediment 2006 (ECC) - ROUND 3					
	Draft LTM Marine Sed report for 2006	2/28/2007		4/18/2007		
	Comments from Regulators	6/2/2007		5/24/2007	45 days after submission of draft document	EPA - 5/22/07, NOAA - 5/24/07, RIDEM - Not Commenting
	Comment Resolution	7/17/2007		8/21/2007	90 days after submission of draft document	Discussed at RPM Mtg of 7/18/07 - Add'l info requested. Navy response sent 8/21/07.
	Final LTM Marine Sed Report for 2006	8/31/2007		12/12/2007	135 days after submission of draft document	

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SITE	ACTIVITY	PLANNED DUE DATE	AGREED-ON DATE	ACTUAL DATE	FFA DURATIONS	COMMENTS
Site 1 McAllister Point (Continued)	LONG TERM MONITORING (LTM) - Groundwater (EGC)					
	Draft LTM Report for 2007	1/30/2008	2/29/2008	3/30/2008		Report delayed due to late receipt of toxicity data in late December 2007
	Comments from Regulators	3/15/2008	4/14/2008	5/14/2008	45 days after submission of draft document	Comments from EPA 5/14/08
	Comment Resolution	4/29/2008	7/31/2008		90 days after submission of draft document	Draft responses to EPA at 7/16/08 RPM's Meeting
	Final LTM Report for 2007	6/13/2008	8/30/2008		135 days after submission of draft document	
	LONG TERM MONITORING Marine Sediment 2007 (EGC) - RGAB					
	Draft LTM: Marine Sed report for 2007	1/30/2008	2/29/2008	3/30/2008		Report delayed due to late receipt of toxicity data in late December 2007
	Comments from Regulators	3/15/2008	4/14/2008	5/14/2008	45 days after submission of draft document	Comments from EPA 5/14/08
	Comment Resolution	4/29/2008	7/31/2008		90 days after submission of draft document	Draft responses to EPA at 7/16/08 RPM's Meeting
	Final LTM Marine Sed Report for 2007	6/13/2008	8/30/2008		135 days after submission of draft document	
	AIR MODELING STUDIES					
	Navy Assessment of Air monitoring data	11/11/2005	11/11/2005	11/11/2005		Resubmitted
	RIDEM Evaluation of data	12/11/2005	12/11/2005			RIDEM action, clarified in email from C Frye 5/22/06 Evaluation never received as of 1/10/07
	Screening Air Model					Funding moved to Melville Water tower
	ITEM COMPLETE:					Navy opted to not pursue air model, data collection continuing under LTM until next 5 year review
FFA PROCESS RESOLUTION REPORT						
Final Completion Report	12/12/2006	12/12/2006	11/27/2006	60 Days after receipt of comments		
ESD FOR LAND USE CONTROLS						
Draft ESD	8/15/2007		8/10/2007			
Comments from Regulators	9/24/2007		9/7/2007	45 days after submission of draft document		
Comment Resolution	11/8/2007		9/12/2007	90 days after submission of draft document		
Final ESD	12/21/2008		9/19/2007	135 days after submission of draft document	Navy signed 10/18, EPA signed 10/31	
Site 2 Melville North Landfill	GROUNDWATER MONITORING STUDIES					
	Submit Draft Round 3 Monitoring report	10/15/2004	10/15/2004	10/15/2004		
	RIDEM Letter, Comments on monitoring report			7/1/2005		Letter states that sheens constitute free product Please see Navy letter to RIDEM defining position on sheens 11/6/06, see Site 9
	Navy Response to RIDEM comment letter					
RIDEM Response Letter			1/21/2007		RIDEM Response on Sheens. See Site 09	
Site 4 Coddington Cove Rubble Fill Area	PRELIMINARY ASSESSMENT (PANS)					
	Preliminary Assessment Report, Coddington Cove	4/14/2005	4/14/2005	4/14/2005		
	Comments on Preliminary Assessment Report	5/14/2005	5/14/2005	5/16/2005	30 days after receipt of report	EPA comments 5/16/05, RIDEM comments 5/27/05
	Draft SASE Work Plan					Low Priority - Planned FY10
Draft SASE Report						

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SITE	ACTIVITY	PLANNED DUE DATE	AGREED-ON DATE	ACTUAL DATE	FFA DURATIONS	COMMENTS
Site 8 NUSC Disposal Area	RI WORK PLAN COMMENTS					
	Submit Draft RI Work Plan	2/3/2006	—	2/3/2006		
	Submit Draft Final RI work Plan	6/15/2006	—	6/29/2006	90 days after receipt of comments	
	Submit final RI work plan	9/26/2006	—	—	60 days after receipt of comments	
	Submit final RI work plan REV-1	—	—	10/6/2006	Not Anticipated	Minor revisions to HHRA section of work plan
	Submit final RI work plan REV 2	1/15/2007	—	1/5/2007	Not Anticipated	Based on conference call 11/3/06 and resolution 11/15/06
	ITEM COMPLETE					
	DRUM REMOVAL REPORT (TNS) (RUS)					
	Draft Drum Removal Report	6/26/2006	—	6/26/2006		
	Receive Regulator Comments	8/10/2006	—	8/10/2006	45 days after receipt of draft document	EPA (7/13/06) RIDEM 8/11/06
	ITEM COMPLETE					
	NUSC BACKGROUND REPORT (TNS) (RUS)					
	Submit Draft Background Report	4/17/2006	—	4/17/2006		
	Receive Regulator Comments on Draft Report	6/1/2006	—	6/2/2006	45 days after receipt of draft document	EPA 5/9/06, RIDEM 6/2/06
	Concurrence on Final	10/5/2006	—	10/2/2006	30 days after submittal of final document	EPA concurs - 10/2/06, RIDEM - requests southern fill area delineated
	RIDEM Letter Clarification on Southern Fill Area	—	—	3/21/2007	NA	Map Showing southern fill area as to be determined. Map to be appended to meeting notes 3/21/07
	ITEM COMPLETE					
	FFA WORK PLAN COMMENTS (CONCURRENCE)					
	Fieldwork Scoping Mtg & Site Walk	NA	12/19/2006	12/19/2006	As agreed 11/15/06	Complete - RIDEM requested Fill and pipes be investigated in RI
	Initiate Field Work NUSC RI	7/9/2007	—	7/10/2007		Refer to Field Schedule emailed from Colter 6/28/07
	Submit Draft RI Report for NUSC		—	—		After completion of both phases of fieldwork (Eco/Hydro).
	Comments to the Draft RI Report	1/15/2009	—	—	45 days after submission of draft document	
	Response to Comments, Draft RI Report	3/1/2009	—	—	90 days after submission of draft document	
	Resolution of Comments & Draft Final RI Report	4/15/2009	—	—	135 days after submission of draft document	
	Concur/Disput Draft Final RI Report	5/15/2009	—	—	30 days after submission of draft final document	
	Final RI Report for NUSC	6/14/2009	—	—	60 days after submission of draft final document	Based on Concurrence.
	Submit Draft FS Report for NUSC		—	—		
	Comments to the Draft FS Report	9/28/2009	—	—	45 days after submission of draft document	
Response to Comments, Draft FS Report	11/12/2009	—	—	90 days after submission of draft document		
Resolution of Comments & Draft Final FS Report	12/27/2009	—	—	135 days after submission of draft document		
Concur/Disput Draft Final FS Report	1/26/2010	—	—	30 days after submission of draft final document		
Final FS Report for NUSC	2/25/2010	—	—	60 days after submission of draft final document	Based on Concurrence.	
Submit Draft PRAP for NUSC		—	—			
Submit Draft ROD for NUSC		—	—	225 days after submission of draft PRAP		

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SITE	ACTIVITY	PLANNED DUE DATE	AGREED- ON DATE	ACTUAL DATE	FFA DURATIONS	COMMENTS
Site 9 Old Fire Fighting Training Area	SHEEN LETTER (TINUS)					
	Navy Position on NAPL and Sheens	NA	NA	11/6/2006		Defines position on Melville and OFFTA, Tank Farms
	RIDEM Response to Navy Letter	NA	NA	1/21/2007		RIDEM position on NAPL
	Revised FS for Site 09 will close this loop	---	---	---		Apply LNAPL Decision to Site 2
	RECREATIONAL LAND USE CLARIFICATION (TINUS)					
	Navy Letter clarifying recreational land use	NA	NA	11/6/2006		Defines state criteria applicable to the site.
	RIDEM Response to Navy Letter	NA	NA	1/19/2006		RIDEM position on Recreational use and Land Use Controls
	Navy Letter 3/16/07	NA	NA	3/16/2007	Item Closed	Letter indicates concurrence on this matter, Revised FS will close this loop
	ACTION MEMORANDUM FOR SOIL REMOVAL (TINUS)					
	Draft Action Memo for Soil Removal Actions	9/30/2006	9/30/2006	9/21/2006		
	Comments to Draft Action memo	10/21/2006	10/21/2006	11/7/2006	30 days after draft doc	EPA Comments 10/31/06, RIDEM Comments 11/7/06
	Resolution of Comments	12/7/2006	12/1/2006	12/1/2006	30 days after comments received	EPA 12/24/06, RIDEM 1/9/07
	Final Action Memo	12/21/2006	12/21/2006	2/9/2007	60 days after comments received	ITEM COMPLETE Signed 1/15/07, sent out 2/9/07, TINUS Cover Letter
	PUBLIC OUTREACH - OFFTA REMOVAL ACTION (TINUS)					
	RAB presentation by Tiger Team Rep	---	---	1/17/2007		
	Draft Fact Sheet Update	1/17/2007	---	1/15/2007		Handed out at RPMs meeting, Official version sent out 1/29/07
	Comments to Draft Fact Sheet Update	1/30/2007	---	3/12/2007	15 days	EPA Comments 2/26/07, RIDEM comments 3/12/07
	Final Fact Sheet Update	2/15/2007	---	5/1/2007	15 days	
	ITEM COMPLETE	2/15/2007	---	5/1/2007	15 days	
	REMOVAL ACTION WORK PLAN (TINUS)					
	Draft Removal Action Work Plan	1/2/2007	1/2/2007	1/10/2007		
	Comments to Draft Removal Action Work Plan	2/9/2007	---	2/26/2007	30 days after submission of draft document. Actual is date email rec'd by RIDEM	EPA letter dated 1/29/07; RIDEM letter dated 2/23/07
	Response to comments, Draft RA Work Plan	3/28/2007	---	5/29/2007	60 days after submission of draft document or 30 days after receipt of last comments	Draft response discussed at RPMs Meetings 3/21/07 and 5/16/07
	Draft Final RA Work Plan	4/27/2007	6/12/2007	5/29/2007	90 days after submission of draft document or 60 days after receipt of draft comments	Revised schedule from 5/16/07 RPM Meeting
	Concurrence on Draft Final RA Work Plan	6/24/2007	7/20/2007	6/29/2007		EPA Comments 6/25/07; RIDEM 6/29/07
	Final RA Work Plan	7/29/2007	8/9/2007	9/14/2007	60 days after submission of draft final	
	Commence Fieldwork	---	---	1/7/2008		
	Draft Removal Action Completion Report	TBD	---	---		Field Work Completion holding pending final test pits

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SITE	ACTIVITY	PLANNED DUE DATE	AGREED-ON DATE	ACTUAL DATE	FFA DURATIONS	COMMENTS
Site 9 Old Fire Fighting Training Area (Continued)	REVETMENT DESIGN (TINUS)					
	30% Design	---	---	5/1/2007		Considered part of the Removal Action WP
	Comments to the 30% design	5/31/2007	---	6/12/2007	30 days after submission of 30% document. Actual is date rec'd by RIDEM	EPA - 5/21, CRMC - 5/23, RIDEM 6/12
	Response to comment, 30% Design	6/30/2007	---	8/13/2007		RPM Mtg 7/18/07: Will ReDesign based on RIDEM/CRMC comments
	30% Design (ReSubmission)	9/10/2007	---	9/26/2007		Comments on response above.
	Comments to the 30% design (Resubmission)	---	10/10/2007	11/5/2007	30 days after submission of 30% document	
	Response to comment, 30% Design (Resubmission)	---	1/18/2008	1/25/2008	60 days after submission of 30% document	Comments resolved 11/14/07. Responses anticipated 1/18/08.
	90% Design	7/30/2007	3/30/2008	6/27/2008	90 days after submission of 30% document	90% Design being completed for submittal.
	Comments to the 90% design	8/29/2007	7/27/2008	---	30 days after submission of 90% document	
	Response to comment, 90% Design	9/28/2007	8/27/2008	---	60 days after submission of 90% document	
	Resolution of comments	10/28/2007	9/27/2008	---	90 days after submission of 90% document	
	100% Design	11/27/2007	10/27/2008	---	120 days after submission of 90% document	
	REVISED FS (TINUS)					
	Draft FS Revision 1 Report	12/14/2007	10/1/2007	12/14/2007		
	Comments to the Draft FS Revision 1 Report	1/28/2008	---	6/27/2008	45 days after submission of draft document	EPA 4/15/08. RIDEM 6/27/08
	Response to Comments, Draft FS Revision 1 Report	3/13/2008	8/11/2008	---	90 days after submission of draft document	
	Resolution of Comments & Draft Final FS Report	4/27/2008	9/25/2008	---	135 days after submission of draft document	
	Concur/Disput Draft Final FS Report - Revision 1	5/27/2008	10/25/2008	---	30 days after submission of draft final document	
	Final FS Revision 1 Report	6/26/2008	11/24/2008	---	60 days after submission of draft final document	
	PROPOSED REMEDIAL ACTION PLAN (PRAP) and RECORD OF DECISION (ROD)- TINUS					
Draft PRAP	10/31/2008	---	---		NEED NEW SCHEDULE	
Draft ROD	6/13/2009	---	---		NEED NEW SCHEDULE	
Site 12 Tank Farm 4	SITE CLOSURE REPORT (TIEC)					
	Draft Report	10/20/2006	10/20/2006	10/20/2006		
	EPA Comments on Draft	11/18/2006	11/18/2006	11/7/2006	30 days after receipt of draft report	EPA 11/7/06; RIDEM 11/30/06 (RIDEM comments lost in mail, actually received by Navy via email 12/20/06)
	Comment Resolution/Draft Final Report	12/18/2006	1/19/2007	3/14/2007	30 days after receipt of comments	
	Comments on Draft Final Report	---	---	4/7/2007		EPA 4/3/07; RIDEM 4/17/07
	Final Report	---	---	6/19/2007		
	ITEM COMPLETE					

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Site 12 Tank Farm 4 (Continued)	DATA GAPS AND FEASIBILITY STUDY (TINUS)					
	Draft Technical Memorandum on Data Gaps For RA	6/3/2007	---	6/15/2007		
	Comments to Draft Tech Memo on Data Gaps	8/6/2007	---	8/6/2007	45 days after submission of draft document	EPA 7/16/07; RIDEM 8/6/07
	Response to Comments to Draft Tech Memo	9/20/2007	---	9/14/2007	90 days after submission of draft document	Comment Resolution - 11/14/07
	Final Tech Memo on Data Gaps	11/2/2007	TBD	1/4/2008	135 days after submission of draft document	
	DQO Meeting for Work Plan	---	---	1/9/2008		
	Draft Work Plan for Data Gaps	1/14/2008		---		NEED NEW SCHEDULE
	Comments to Draft Work Plan	11/28/2007		---	45 days after submission of draft document	
	Response to comments, Draft Work Plan	1/12/2008		---	90 days after submission of draft document	
	Draft Final Work Plan	2/26/2008		---	135 days after submission of draft document	
	Concurrence on Draft Final Work Plan	3/27/2008		---	30 days after submission of draft final document	
	Final Work Plan	5/26/2008		---	60 days after submission of draft final document	
	Commence Fieldwork	TBD		---		
	Draft Data Gap Report	3/27/2009		---		
	Draft HHRA and ERA Report	7/9/2009		---		
	Draft FS Report	3/12/2010		---		
	Final FS Report	10/22/2010		---		
PROPOSED REMEDIAL ACTION PLAN (PRAP) and RECORD OF DECISION (ROD)- TINUS						
Draft PRAP	11/22/2010					
Draft ROD	7/5/2011				225 days after submission of draft PRAP	
Site 13 Tank Farm 5	SITE CLOSURE REPORT (TREC)					
	Draft Report	10/20/2006	10/20/2006	10/20/2006		
	EPA Comments on Draft	11/18/2006	11/18/2006	11/7/2006	30 days after receipt of draft report	EPA 11/7/06; RIDEM 11/30/06 (RIDEM comments lost in mail, actually received by Navy via email 12/20/06)
	Comment Resolution/Draft Final Report	12/18/2006	1/19/2007	3/14/2007	30 days after receipt of comments	
	Draft Final report	1/18/2007	1/18/2007	3/14/2007	60 days after receipt of comments	Discuss 3/21/07
	Final Report	---	---	6/19/2007		
ITEM COMPLETE						

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SITE	ACTIVITY	PLANNED DUE DATE	AGREED- ON DATE	ACTUAL DATE	FFA DURATIONS	COMMENTS	
Site 13 Tank Farm 5 (Continued)	DATA GAPS AND FEASIBILITY STUDY (TINUS)						
	Draft Technical Memorandum on Data Gaps For RA	6/3/2007	---	6/15/2007			
	Comments to Draft Tech Memo on Data Gaps	8/6/2007	---	8/6/2007	45 days after submission of draft document	EPA 7/16/07; RIDEM 8/6/07	
	Response to Comments to Draft Tech Memo	9/20/2007	---	9/14/2007	90 days after submission of draft document	Comment Resolution - 11/14/07	
	Final Tech Memo on Data Gaps	11/2/2007	TBD	1/4/2008	135 days after submission of draft document		
	DQO Meeting for Work Plan	---	---	1/9/2008			
	Draft Work Plan for Data Gaps	3/14/2008		---		NEED NEW SCHEDULE	
	Comments to Draft Work Plan	11/28/2007		---	45 days after submission of draft document		
	Response to comments, Draft Work Plan	1/12/2008		---	90 days after submission of draft document		
	Draft Final Work Plan	2/26/2008		---	135 days after submission of draft document		
	Concurrence on Draft Final Work Plan	3/27/2008		---	30 days after submission of draft final document		
	Final Work Plan	5/26/2008		---	60 days after submission of draft final document		
	Commence Fieldwork	TBD		---			
	Draft Data Gap Report	3/27/2009		---			
	Draft HHRA and ERA Report	7/9/2009		---			
	Draft FS Report	3/12/2010		---			
	Final FS Report	10/22/2010		---			
	PROPOSED REMEDIAL ACTION PLAN (PRAP) and RECORD OF DECISION (ROD)- TINUS						
	Draft PRAP	11/22/2010		---			
	Draft ROD	7/5/2011		---		225 days after submission of draft PRAP	
	TANKS 53 and 56 (TINUS)						
	Draft Round 5 Groundwater report	10/30/2004		---	10/30/2004		
	Comments to Draft Report	11/30/2004		---	12/6/2004	30 day after receipt of report	EPA - 11/19/04, RIDEM - 12/6/04
	Response, Resolution to Comments	1/6/2005		---	1/18/2005	30 days after receipt of comments	
	Additional Comments	NA		---	1/25/2005	Not anticipated	EPA letter
	ITEM COMPLETE	---		---	---		GW to be incorporated as part of overall ROD for OU 2
	TREATMENT PLANT DEMO						
	Internal Draft Basis of Design Report (TINUS)	---		---	11/7/2007		
	Draft BOD (TINUS)	---		---	1/3/2008		
	RIDEM Comments on Draft	2/2/2008		---	1/29/2008	30 days after submission of draft report	
	Final BOD (TINUS)	3/3/2008		---	4/15/2008	60 days after submission of draft report	
	Treatment Plant Demo	TBD		TBD	TBD		

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Site 17 Gould Island	REMEDIATION INVESTIGATION REPORT (TINUS)					
	Draft RI report	3/30/2006	3/30/2006	5/12/2006		
	Comments to the Draft RI	6/26/2006	6/26/2006	6/30/2006	45 days after receipt of draft document	EPA 6/22/06, RIDEM 6/30/06
	Response to comments, Draft RI/ Comment Resolution	8/14/2006	8/14/2006	8/22/2006	45 days after receipt of comments	Response 8/14/06
	Comments on Response	NA	NA	9/18/2006	Not anticipated	Draft Final RI report addresses clarifications.
	Draft Final RI report	9/30/2006	9/30/2006	10/25/2006	90 days after receipt of comments	
	EPA Concurrence on the Draft Final Report	11/25/2006	11/25/2006	11/16/2006	30 days after draft final doc	
	RIDEM Concurrence on the Draft Final Report	11/25/2006	11/25/2006	11/24/2006	30 days after draft final doc	Short comments instead of concurrence
	Final RI Report	12/25/2006	12/25/2006	12/29/2006	60 days after draft final doc	ITEM COMPLETE
	PHASE 2 RI AND BASELINE ECOLOGICAL RISK ASSESSMENT (TINUS)					
	Mars Deliverable for RIDEM	NA	NA	12/29/2006	Anticipate 12/15/06	In accordance with RIDEM comment to draft RI report
	Technical Meeting to Discuss Phase 2 RI and BERA	1/18/2007	--	1/18/2007		Agreement at November 15 RPMs meeting.
	DQO Meeting for Work Plan	1/9/2008	--	1/9/2008		Conf Call 10/9/07 to discuss path forward. QAPP worksheets 10,11,15 submitted 10/26/07. Minor comments submitted 12/19/07. Anticipate 2/8/08.
	Draft Phase 2 RI and BERA Work Plan	12/28/2007	3/28/2008	3/28/2008		Previously anticipated on 2/8/08. Extension request submitted 2/1/08.
	Comments to Draft Work Plan	1/7/2008	5/12/2008	5/19/2008	45 days after submission of draft document	EPA 5/1/08, RIDEM 5/19/08
	Response to comments, Draft Work Plan	2/21/2008	7/3/2008	--	90 days after submission of draft document	Verify Schedule w/ TINUS
	Draft Final Work Plan	4/6/2008	--	--	135 days after submission of draft document	
	Concurrence on Draft Final Work Plan	5/6/2008	--	--	30 days after submission of draft final document	
	Final Work Plan	7/4/2008	--	--	60 days after submission of draft final document	
	Commence Fieldwork	TBD	--	--		
	Draft Phase 2 RI and BERA Report	2/13/2009	9/25/2009	--		Extension Request Letter of 2/1/08
	Final Phase 2 RI and BERA Report	9/25/2009	--	--		
	Site 17 Gould Island Continued	FEASIBILITY STUDY (TINUS)				
Draft FS Report		7/15/2010	--	--		
Final FS Report		2/24/2011	--	--	195 days after submission of draft document	
PROPOSED REMEDIATION ACTION PLAN (PRAP) and RECORD OF DECISION (ROD)- TINUS						
Draft PRAP		3/25/2011	--	--		
Draft ROD	11/4/2011	--	--	225 days after submission of draft document		

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Site 19 Former Derecktor Shipyard	BUILDING 62 (TINUS)						
	Letter on Building 62 and IR Site Boundary			1/8/2007			
	SANDBLAST GRIT REMOVAL (TEC)						
	Draft EECA for Sandblast Grit Removal	--	--	7/11/2006			
	Public Comment Period starts	--	--	7/19/2006	30 day comment period		No comments
	Comments to Draft EECA	--	--	8/25/2006	45 days after draft submittal		EPA - 7/31/06, RIDEM 11/9/06 (comments to be incorporated into RA work plan)
	Final EECA for Sandblast Grit Removal	10/10/2006	--	10/10/2006			EPA concurs 10/18/06, RIDEM comments 11/9/06 (ARAR Comment to be incorporated into RA work plan)
	Action Memo For Removal	11/10/2006	11/10/2006	11/10/2006			EPA concurs 12/4/06, RIDEM no comments received
	Action memo signed by NAVSTA CO	--	--	11/16/2006			
	Draft Removal Action Work Plan	--	--	1/12/2007	secondary document		
	Comments to Draft RA Work Plan	2/26/2007	--	3/1/2007	45 days after submission of draft document		EPA letter of 1/19/07; RIDEM letter of 3/1/2007
	Response to comments, Draft RA work plan	4/12/2007	--	6/22/2007	90 days after submission of draft document		
	Comment Resolution to Draft RA Work Plan	5/28/2007	--	--	120 days after submission of draft document		
	Final RA Work Plan	6/28/2007	--	6/22/2007	150 days after submission of draft document		
	Fieldwork Completed	--	--	8/7/2007			
	Draft Removal Action Completion Report (RACR)	--	--	12/5/2007			
	Comments to Draft RACR	1/4/2008	--	1/18/2008	30 days after submission of draft document		EPA - 12/27/07; RIDEM - 1/18/2008
	Response to comments, Draft RACR	2/3/2008	--	3/6/2008	60 days after submission of draft document		
	Final RACR	3/4/2008	--	3/6/2008	90 days after submission of draft document		
	ITEM COMPLETE						
	FEASIBILITY STUDY FOR MARINE SEDIMENTS (TINUS)						
	Disputed FS from April 1999	--	--	7/29/1999	Refer to meeting minutes 4/27/1999 and response to comments on Draft Final FS 4/16/1999		
	Meeting to discuss PRGs and Marine Sediment FS	--	--	11/15/2006			Addressed issues at November 15 RPM meeting
	Draft Marine Sediment FS REV 1	2/20/2007	--	3/15/2007			
	Comments to the Draft Marine Sed FS Revision 1	5/6/2007	--	5/8/2007	45 days after submission of draft document		RIDEM - 5/1/2007; EPA - 5/8/2007
	Navy Responses to comments	6/21/2007	--	9/14/2007	90 days after submission of draft document		
	Comment Resolution/Draft Final FS	10/26/2007	--	2/15/2008	45 days after submission of RTC document		All Comments Resolved 11/14/07 except for CAD Cell Use. This has delayed submission of the draft final document
Concur/Dispute - Draft Final Comments Submitted	11/25/2007	3/15/2008	3/25/08? 4/23/08?	30 days after submission of Draft Final		Comment letter from EPA dated 3/25/08. Comments from RIDEM via email 3/18/08 and 4/23/08	
Draft Final Comment Resolution	TBD	--	--				
Submit Final Marine Sediment FS - Revision 1	TBD	--	--				

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Site 19 Derecktor Shipyard (Continued)	PRAP - ROD FOR MARINE SEDIMENTS (TNIS)					
	Draft Proposed Plan	TBD	--	--		Per the RPM Meeting 1/17/07, decision documents would address both the onshore portions of the site as well as the marine sediments. Per the RPM Meeting 7/18/07, Site will be split into two OUs (1 for offshore sediments and 1 for Onshore soil & GW). Paths forward will be independent of each other.
	Comments to Draft Proposed Plan	TBD	--	--		
	Resolution on Comments to PRAP	TBD	--	--		
	Final Proposed Plan	TBD	--	--		
	Public Comment Period	TBD	--	--		
	Draft ROD	TBD	--	--	225 days after submission of draft PRAP	
	Comments to Draft ROD	TBD	--	--		
	Resolution on comments to Draft ROD	TBD	--	--		
	Final ROD	TBD	--	--		
	ONSHORE SOILS & GROUNDWATER TNIS					
	Draft Work Plan - Groundwater Sampling	TBD	--	--		Per the RPM Meeting 1/17/07, decision documents would address both the onshore portions of the site as well as the marine sediments. Per the RPM Meeting 7/18/07, Site will be split into two OUs (1 for offshore sediments and 1 for Onshore soil & GW). Paths forward will be independent of each other. Per the EPA Comment Letter 3/25/08, additional investigations are needed. Scoping sessions to be planned.
	Comments to Draft Work Plan	TBD	--	--	45 days after submission of draft document	
	Resolution on Comments to Draft Work Plan	TBD	--	--	90 days after submission of draft document	
	Draft Final Work Plan	TBD	--	--	135 days after submission of draft document	
	Concur/Dispute	TBD	--	--	30 days after submission of draft final document	
	Final Work Plan - Groundwater Sampling	TBD	--	--	60 days after submission of draft final document	
	Fieldwork	TBD	--	--		
	Draft Report of Results - Groundwater Sampling	TBD	--	--		
Comments to Draft Report of Results	TBD	--	--	45 days after submission of draft document		
Resolution on Comments to Draft Report of Results	TBD	--	--	90 days after submission of draft document		
Draft Final Report of Results	TBD	--	--	135 days after submission of draft document		
Concur/Dispute	TBD	--	--	30 days after submission of draft final document		
Final Report of Results - Groundwater Sampling	TBD	--	--	60 days after submission of draft final document		
FEASIBILITY STUDY ON ONSHORE SOILS & GROUNDWATER TNIS						
Draft Onshore FS	TBD	--	--		Per the RPM Meeting 1/17/07, decision documents would address both the onshore portions of the site as well as the marine sediments. Per the RPM Meeting 7/18/07, Site will be split into two OUs (1 for offshore sediments and 1 for Onshore soil & GW). Paths forward will be independent of each other. Per the EPA Comment Letter 3/25/08, additional investigations are needed. Scoping sessions to be planned.	
Comments to Draft Onshore FS	TBD	--	--	45 days after submission of draft document		
Resolution on Comments to Draft Onshore FS	TBD	--	--	90 days after submission of draft document		
Draft Final Onshore FS	TBD	--	--	135 days after submission of draft document		
Concur/Dispute	TBD	--	--	30 days after submission of draft final document		
Final Onshore FS	TBD	--	--	60 days after submission of draft final document		

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Site 19 Former Derecktor Shipyard (Cont'd)	ONSHORE INVESTIGATION (MUSK)					
	Draft Proposed Plan					
	Comments to Draft Proposed Plan	TBD				
	Resolution on Comments to PRAP	TBD				
	Final Proposed Plan	TBD				
	Public Comment Period	TBD				
	Draft ROD				225 days after submission of draft PRAP	
	Comments to Draft ROD	TBD				
	Resolution on comments to Draft ROD	TBD				
Final ROD	TBD					
Study Area 20 SWOS	FINAL REPORT SIGNOFF					
	Final SWOS Focused SI report	6/1/2006		6/1/2006		Report concludes that SWOS will be addressed under Site 09 FS
	Concurrence on Report	7/1/2006			30 days after receipt of report	EPA 4/5/06 (concurrence on DF version) RIDEM comments 3/24 do not concur
	SITE IS COMPLETE, ACTIONS TO BE CONDUCTED WITH OFFTA					Administrative Closeout??
SA 21 Melville Water Tower	LEAD IN SOIL INVESTIGATION (MUSK)					
	Site Notification Letter	TBD	TBD	1/11/2007		
	SI Field Sampling Plan	NA	NA	6/2/2006		
	Comments to Field Sampling Plan	NA	NA	6/19/2006		EPA 6/19/06, RIDEM 6/14/06
	Response to Comments	7/19/2006	7/19/2006	7/27/2006		
	Revised Field Sampling Plan	8/19/2006	8/19/2006	8/1/2006		
	Data summary report (to be identified as SASE)	11/17/2006	11/17/2006	11/21/2006		
	Comments on Data Summary report	12/21/2006	12/21/2006	1/18/2007	30 days after receipt of report	EPA 12/11/06, RIDEM 1/18/07
	Response to Comments	12/27/2006	12/27/2006	2/14/2007	30 days after receipt of comments	30 days from 1/18 is 2/19/07
	Final Data Summary Report	12/27/2006	12/27/2006	2/14/2007	30 days after receipt of comments	30 days from 1/18 is 2/19/07
	Fence	10/30/2006	10/30/2006		6 month lease	Temp Fence is renewed through Nov 1, 2007
	REGULATORY REVIEW AND PUBLIC PARTICIPATION					
	Open House to Present Report and Fact Sheet	5/1/2007	5/1/2007	5/1/2007		
	Draft Action Memo	5/14/2007		6/11/2007		Anticipate 5/31
	Regulatory Review Complete	6/7/2007		6/28/2007		EPA - 6/25/07; RIDEM - 6/28/07
Final Action memo	7/13/2007		7/23/2007			

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Melville Water Tower con't	NON-TIME CRITICAL REMOVAL ACTION					
	Draft Removal Action RA Work Plan	5/31/2007	---	7/6/2007		
	Regulatory Review Complete	6/14/2007	---	7/20/2007		EPA 7/16/07; RIDEM 7/20/07
	Navy Response to Comments	---	---	8/9/2007		
	Final Removal Action Work Plan	6/19/2007	---	8/17/2007		EPA Concurrence 8/20/07
	Field Mobilization to Tower Property	7/16/2007	---	7/16/2007		
	Demobilization from Tower Property	8/17/2007	8/22/2007	8/31/2007		
	Complete T&D from Tank Farm 5	9/30/2007	---	8/31/2007		
	Draft Removal Action Completion Report	4/4/2008	---	11/21/2007		
	Regulatory Review Complete	12/21/2007	---	1/17/2008**	30 days after submission of draft RACR	EPA - 1/15/08; RIDEM - 1/17/08**
	Navy Responses to comments	---	---	3/14/2008		
	Final RACR	1/20/2008	2/16/2008	6/24/2008	30 days after receipt of last comment	
Blood Lead Model	TBD	---	---			
UXO Site 1 Carr Point	SITE INVESTIGATION					
	Site Notification Letter	---	---	1/11/2007		
	Draft Site Investigation Work Plan	8/29/2007	9/28/2007	11/6/2007		
	Comments to Draft SI Work Plan	12/21/2007	4/7/2008	4/4/2008	45 days after submission of draft document	EPA - 11/27/07; EPA 2nd Review - 3/6/2008; RIDEM - 30-Day Extension Requested from 3/7/2008, Comments 4/4/08
	Response to Comments	5/19/2008	---	---	90 days after submission of draft document	NEED NEW SCHEDULE
	Draft Final SI Work Plan	7/3/2008	---	---	135 days after submission of draft document	
	Concurrence on Draft Final SI Work Plan	8/3/2008	---	---	30 days after submission of draft final document	
	Final SI Work Plan	9/3/2008	---	---	60 days after submission of draft final document	
	Commence Fieldwork	TBD	---	---		
Draft SI Report	1/29/2009	---	---		Was 10/4/2008	
Basewide Background Study	BASEWIDE BACKGROUND SOIL INVESTIGATION (TINUS)					
	Draft Work Plan	1/18/2006	1/18/2006	1/18/2006		
	Comments to Draft Work Plan	3/3/2006	3/3/2006	2/24/2006	45 days after receipt of draft document	EPA - 2/9/06, RIDEM - 2/29/06
	Response/ Resolution of Comments	4/10/2006	4/10/2006	NA	45 days after receipt of comments	
	Final Work Plan	5/25/2006	5/25/2006	5/12/2006	90 days after draft final doc	
	Response to Additional Comments	NA	NA	9/14/2006	not anticipated	Additional RIDEM comments 6/14/06, Response 9/15/06
	Field Investigation complete	2/28/2007	2/28/2007	3/30/2007		
	Internal Draft Report	6/15/2007	---	8/31/2007		
	Draft Basewide Background Report	9/11/2007	---	10/17/2007		
	Comments to Draft Basewide Background Report	12/1/2007	---	12/13/2007	45 days after submission of draft document	EPA - 11/27/07; RIDEM - 12/13/07
	Response to Comments	1/15/2008	---	2/11/2008	90 days after submission of draft document	
Comment Resolution/Draft Final Report	2/29/2008	---	3/14/2008	135 days after submission of draft document		

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Basewide Background Study (Continued)	Comments on Draft Final Report	3/30/2008	---	3/31/2008	30 days after submission of draft final document	EPA 3/31/08
	Final Basewide Background Report	5/29/2008	---	6/30/2008	60 days after submission of draft final document	ITEM COMPLETE
RPM Meeting Notes	Draft Notes to the Meeting 9/21/06	10/16/2006	---	---	2 weeks after meeting	Draft Sent to RIDEM and USEPA
	Final Notes to the Meeting 9/21/06	11/16/2006	---	11/16/2006		
	Draft Notes to the Meeting 11/15/06	11/30/2006	---	12/1/2006	2 weeks after meeting	No comments as of 1/5/07
	Final Notes to the Meeting 11/15/06	12/15/2006	---	1/8/2007		
	Draft Notes to the Meeting 1/17/07	1/30/2007	---	2/2/2007	2 weeks after meeting	No comments as of 3/2/07
	Final Notes to the Meeting 1/17/07	12/15/2006	---			
	Draft Notes to the meeting 3/21/07	3/21/2007	---	3/27/2007	2 weeks after meeting	EPA Comments 3/29
	Final notes to the Meeting 3/21/07	3/28/2007	---	6/6/2007		
	Draft notes to the Meeting 5/16/07	5/23/2007	---	5/25/2007	2 weeks after meeting	EPA Comments 5/29
	Final Notes to the Meeting 5/16/07	5/30/2007	---	6/6/2007		
	Draft Notes to the Meeting 7/18/07	8/1/2007		8/7/2007	2 weeks after meeting	
	Final Notes to the Meeting 7/18/07	---		8/21/2007		
	Draft Notes to the Meeting 9/19/07	10/3/2007		10/3/2007	2 weeks after meeting	
	Final Notes to the Meeting 9/19/07	---		10/10/2007		
	Draft Notes to the Meeting 11/14/07	11/28/2007		12/6/2007	2 weeks after meeting	
	Final Notes to the Meeting 11/14/07	---		1/16/2008		Hand Delivered at the RPM Meeting
	Draft Notes to the Meeting 1/16/08	1/30/2008		1/29/2008	2 weeks after meeting	
	Final Notes to the Meeting 1/16/08	---		3/4/2008		
	Draft Notes to the Meeting 3/19/08	4/2/2008		4/7/2008	2 weeks after meeting	
	Final Notes to the Meeting 3/19/08	---		5/6/2008		
	Draft Notes to the Meeting 5/21/08	6/4/2008		6/9/2008	2 weeks after meeting	
	Final Notes to the Meeting 5/21/08	---		7/3/2008		
	Draft Notes to the Meeting 7/16/08	7/30/2008		---	2 weeks after meeting	
Final Notes to the Meeting 7/16/08	---		---			

TBD - To Be Determined

NA - Not Anticipated

Planned DUE DATES are based on FFA Durations unless noted

Red text indicates item not yet completed

Blue text indicates issued to be discussed at upcoming RPM Meeting

Yellow shading denotes item needs attention

FFA Date on Schedule

FFA Date Missed - FFA Schedule Extension Request needed

Responses to EPA Comments
Draft Marine Sediments Monitoring Report - Round 4:
October 2007 for the McAllister Point Landfill
Newport, Rhode Island

Reviewer: Ginny Lombardo
 Date: May 14, 2008
 Respondent: ECC
 Date: June 6, 2008

Comment #	Location	Comment	Response
1	General Comment	<p>Samples MCA-SD-16-04 (Group 2), MCA-SD-SDA-M-02-04 (Group 2), and MCA-SD-JCC-S-01-04 (Group 5) had toxic effects on <i>Leptocheirus</i> survival, as defined by the Work Plan. As noted in the report, no apparent chemical toxic agent could be identified at these locations. The water quality parameters in the tests were generally good. One exception is ammonia. While not discussed in the report, the data show that ammonia was elevated at the beginning of the test (at the end of the test, concentrations were low). Total ammonia concentrations were below 16 mg/L, the level at which toxicity test results could be affected by total ammonia, as noted in the EPA Guidance Method for Assessing the Chronic Toxicity of Marine and Estuarine Sediment-Associated Contaminants with the Amphipod <i>Leptocheirus plumulosus</i>. Concentrations of unionized ammonia, however, exceeded 0.8 mg/L in three samples (MCA-SD-JCC-02-04, MCA-SD-JCC-S-01-04, and SD-OS-29-04). This level is identified as the acceptable test condition in the EPA guidance. While there does not seem to be a pattern with unionized ammonia and toxic versus non-toxic samples that identifies it as an obvious toxic factor, the exceedances should be noted in the report in order to recognize that test conditions may not have been optimal. Also, several samples, other than the three listed here, had elevated unionized ammonia concentrations. Please address the possibility that concentrations could have risen to greater than 0.8 mg/L before decreasing again to the low concentrations seen on day 27. In any future testing, when ammonia concentrations approach toxic levels at the start of the test, some consideration should be given to continued monitoring of this parameter during the test, and possibly adding a water renewal and chemistry check prior to test organism introduction, in case the ammonia was built up during sample storage and could be quickly dissipated. This could remove ammonia as a confounding toxic factor.</p>	<p>In the <i>Leptocheirus plumulosus</i> toxicity section, the total ammonia level at the beginning of the test will be noted as elevated but not exceeding the ammonia toxicity level of 16 mg/L.</p> <p>In the <i>Leptocheirus plumulosus</i> toxicity section, the un-ionized ammonia level at the beginning of the test will be noted as elevated and possibly exceeding 0.8 mg/L during the test.</p> <p>Further for future testing the toxicity laboratory will be directed to collect 2 additional total and un-ionized ammonia testing if the initial readings are approaching toxic levels.</p>
2	General Comment/Page 4-13.	<p>The text discusses yearly differences in COC concentrations in biota. The discussion of metals data notes, in particular, the differences between 2006 and 2007. As was done for the discussion of PCBs, the summary of difference between years should examine differences over</p>	<p>The text will be revised to include a summary of multi-year trend in ICOCs. See also Appendix E in the report, which provide data trend plots.</p>

Comment #	Location	Comment	Response
		all previous years, not just an increase or decrease from 2006. Some chemicals had peaks in 2006 (e.g., manganese and mercury in Group 5) and only looking at the difference between 2006 and 2007 may not capture an accurate trend over the entire period.	
3	General Comment	No biota data are presented for MCA-SDA-S-04 in Group 2. Were bivalves collected at this location? If not, please explain the missing sample.	<p>Biota data were collected from sample location MCA-SDA-S-04 in Group 2, during Round 4; however, Biota (Clams) were not collected from sample location MCA-08 in Group 3, during Round 4.</p> <p>No biota samples were collected from this station, during Round 4, due to the rocky bottom. Similarly in 2005 Round 2 biota data were not collected from this location due to the rocky bottom.</p>
4	General Comment	Please review the qualifiers in the Group mean columns in the tables. For example, in Table 4-7, aluminum and antimony should have a U qualifier for the 2007 means.	A group mean is the average of the magnitude of detections and 1/2 the value of the method reporting limit for non-detect results. The group mean is a mathematically derived numerical result, so data qualifiers, such as "U" for non-detect, are not assigned to the group mean result.
5	General Comment	Some of the terms in the tables are not defined, or are not defined accurately (e.g., Matrix "ET" in Table 4-7; PAL-vs-RDL in Table 4-7). Please review and correct as needed.	All terms in the table footnotes will be reviewed and properly defined.
6	General Comment	The Work Plan indicates that water depths should be measured at each sample location and recorded along with the tide stage. Were these measurements taken? If so, please add the information to the report.	Depth to bottom was recorded in the field logbook, and this data will be added to Table 3-1.
7	General Comment	The Work Plan indicates that biota samples should be "collected by divers by hand based on previous experience at the site and limitations of sampling in eelgrass areas." The text on Page 3-5, however, states that a commercial raker was employed to collect the bivalve samples. Please explain why divers were not used and confirm that the raking method did not affect eelgrass plants.	<p>A commercial raker has been used to collect samples since Round 1 with great success. Locations, such as MCA-08 during Round 1, Round 2, and Round 4, typically have not yielded bivalves due to the rocky nature of the habitat.</p> <p>Further, as the use of rakes and dredges has proved to be successful, the additional health and safety risk inherent with SCUBA diving is not warranted.</p> <p>Also during the Environmental Risk Assessment (SAIC/URI 1997) rakes were used to collect bivalves.</p> <p>Raking is confined to a small area, so any potential damage to</p>

Comment #	Location	Comment	Response
			the eelgrass population at the site is highly localized and minimal in comparison to the size of the area.
8	General Comment	The report does not provide the sizes of the individual bivalves that were collected by the raking method. Because organisms can have higher concentrations of bioaccumulative chemicals in their tissue as they age, this information would help interpret differences between sites and between years. Please, add these results.	Bivalves sizes were not recorded in the log book, as required by the Work Plan during Round 4. Bivalves sizes will be recorded during Round 5.
9	General Comment	The text on Page 3-1 explains that a sample could not be collected at sample station MCA-08 because the area was rocky. This explanation should be enhanced a little. Sediment had been collected at this location in the past. Given that there was enough sediment at the location to collect samples in 2004, 2005, and 2006, please provide further explanation for the area no longer having available sediment to allow for sampling. Will this spot be resampled in the next sampling round or will the location be moved? For the next sample round, it might be preferable to use a diver to collect the sample at MCA-08.	<p>At sample location MCA-08 sample collection attempts were performed using a dredge. The dredge was dropped five times without successful recovery of sediment. Also the rake used for clam collection was damaged on the rocky bottom, with the loss of several teeth on the clam basket.</p> <p>Sample location MCA-08 will be sampled in Round 5. If sediment can not be collected, then the location will be offset by 20-feet.</p> <p>The text on page 3-1 will be revised, "At Station MCA-08, the ocean bottom was comprised of rocks and the dredge could not collect sediment, and five dredge drops failed to recover any sediment".</p> <p>The use of rakes and dredges is preferable, as the additional health and safety risk inherent with SCUBA diving is not warranted.</p>
10	General Comment	The table numbers for many of the data tables have been removed by the three-hole punch for insertion into the three-ring binder. The missing table numbers make it difficult to review the data. It is not a critical issue but, if the Table numbers/titles could be shifted to avoid the hole, it would be helpful	Locations of table headers will be moved, so that they are legible in the 3-hole punch bound reports.
11	General Comment	The report has numerous <i>typos</i> and grammatical errors throughout the text. Please review.	Typos and grammatical errors will be corrected throughout the report.
Specific Comment 1	<u>Page 3-5, §3.2:</u>	At the top of the page, the text states that <i>Mercenaria</i> and <i>Pitar</i> bivalves were collected. Subsequent sections and data tables only refer to <i>Mercenaria</i> , however. Please, clarify if <i>Pitar</i> were collected and/or remove the reference to <i>Pitar</i> in this section.	The sentence, "For the ERA, <i>Mercenaria</i> , was the preferred species for analysis, but it was necessary to replace or combine <i>Mercenaria</i> with <i>Pitar</i> at stations where biomass requirements", will be deleted from the text, as sufficient biomass of <i>Mercenaria</i> bivalves was collected from all sample locations, except MCA-08.

Comment #	Location	Comment	Response
Specific Comment 2	<u>Page 4-4, §4.2:</u>	In the bullet for chrysene (note misspelling for chrysene) the text states: "This analyte evaluated starting in 2004." This statement is repeated in subsequent bullets for chrysene. Please, clarify the meaning of this sentence.	Chrysene is not an ICOC listed in the LTMP (TiNUS October 2005); however, in 2004 it was added to the ICOC list by the Navy. The sentence, "This analyte evaluated starting in 2004" will be deleted from the Round 4 report text, as footnote in Table 4-1 states that chrysene was added as an ICOC, but it is not in the LTMP.
Specific Comment 3	<u>Page 4-14, §4.4:</u>	The final sentence states: "Further all PAH levels in biota from all Sample Groups and the Reference Group are less than the PALs, which indicates that ICOC PAH exceedances of the BPRGs and RPRGs are not adversely affecting ecological receptors." This statement is too absolute. PAHs are not very bioaccumulative but can still be toxic. An assertion that COCs in sediment are not adversely affecting ecological receptors is more directly supported by the toxicity test data. In this section, it is more accurate to say that COCs in sediment have not bioaccumulated to tissue concentrations likely to cause negative effects. Please, make this same correction elsewhere as needed (e.g., bottom of Page 5-1).	In Section 4.4, the following revision will be inserted, "Further all PAH levels in biota from all Sample Groups and the Reference Group are less than the PALs, which indicates that ICOC PAH exceedances of the BPRGs and RPRGs have not bioaccumulated to tissue concentrations likely to cause negative effects". In Section 5.0, the following revision will be inserted, "Biota testing showed no bioaccumulation to tissue concentrations likely to cause negative effects, as ICOC PAHS.....".
Specific Comment 4	<u>Page 4-15, §4.5.1:</u>	The text refers to a "single composite reference sample result." This is a little confusing. Presumably, the results from reference samples were averaged (arithmetic or geometric mean?). The term "composite" suggests that the sediment samples themselves may have been composited, which wasn't the case. Please clarify.	The text will be revised as follows, "Toxicity test results from the five sub-sample sites in reference Group 5 were arithmetically averaged to provide a single reference group result".
Specific Comment 5	<u>Page 4-15, §4.5.1:</u>	The text states that samples were rated as toxic if "mortality was at least 25% higher than and statistically different from Reference Group sample mortality." This overstates the consideration of the Reference results. The Work Plan states that Reference data would be used to interpret the results, not to define the results as toxic or non-toxic. Please, refine the text to clarify this point.	The text will be revised as follows, "For these tests, sediments are rated as toxic if mortality is at least 25 percent higher than the laboratory control sample. Toxicity data will also be compared with Group 5 (reference station) data in the interpretation of effects to receptors".
Specific Comment 6	<u>Page 4-16, §4.5.1:</u>	The last paragraph on the page states that mean <i>Leptocheirus</i> survival between Groups 2, 3, and 5 was comparable. It does not appear that these results were actually compared statistically. A statistical comparison with Reference results should be made in order to support the assertion that the mean results for a particular group are acceptable. Standard toxicity test statistical approaches should be used for toxicity test interpretation. In addition, any non-mortality endpoints such as reproduction and growth that differ significantly from reference stations should be discussed relative to chemical concentrations of all measured	The following text will be added to this section, "Differences in <i>Leptocheirus</i> toxicity results within a group may be attributable to environmental factors other than the ICOCs". The mean (arithmetically derived) <i>Leptocheirus</i> survival rate for Group 2 was by non-statistical comparison less than 25% different than the Group 5 (reference) <i>Leptocheirus</i> survival rate, and the Group 3 mean <i>Leptocheirus</i> survival rate was

Comment #	Location	Comment	Response
		<p>potentially toxic chemicals, not just those for which PRGs were derived. EPA had commented previously that the PRG derivation approach used for this site assumes co-location of contaminants to some degree. This assumption could in some instances result in contaminants that lack a PRG still contributing to toxicity in a toxicity test.</p>	<p>less than 25% different than the Group <i>Leptocheirus</i> survival rate.</p> <p>Only the indicator COCs were evaluated as reported, as these were determined to be key contaminants in evaluation of the Site during the DQO process.</p>
Specific Comment 7	Table 4-1:	<p>The table lists a BPRG for chrysene of 589 ug/kg. The other BPRGs were previously established and listed in the Work Plan. The BPRG for chrysene was not. Please, explain how this BPRG was derived.</p>	<p>Chrysene is neither in the ROD nor the LTMP as an ICOC. Chrysene was added to the ICOC list by the Navy in Round 1 to provide additional PAH environmental indicators.</p>
Specific Comment 8	Table 4-8 through 4-10:	<p>The second column is headed "Sample Group Number." Does this refer to Groups 2, 3, and 5 or to a statistical grouping? If it refers to the Group numbers, please add them:</p>	<p>The Sample Group Number listed in Tables 4-8, 4-9, and 4-10 is an internal laboratory control number used only for the laboratory's internal purposes.</p> <p>For clarity, the laboratory control number will be removed, and the McAllister Point Sample Group number will be inserted.</p>

Responses to EPA Comments
Annual Monitoring Report, Operation & Maintenance
Activities 2007 Site 01-McAllister Point Landfill
Newport, Rhode Island

Reviewer: Ginny Lombardo
 Date: May 14, 2008
 Respondent: ECC
 Date: June 6, 2008

Comment #	Location	Comment	Response
1	General	Landfill gas sampling data are provided in Section 2.4 and referenced tables and Appendices in the report. Please add a section on the interpretation of the landfill gas sampling results, describing how the landfill gas has changed since implementation of the remedy, whether the results are within acceptable ranges, and whether the results support that the remedy is protective.	<p>A section will be added to the text interpreting the results of the landfill gas sampling that has occurred since 2002.</p> <p>The LTMP (TtNUS October 2005) nor the ROD provide action limits for landfill gas; however, the two downwind monitoring stations for ambient air were non-detect for methane and total hydrocarbons.</p> <p>A statement will be added to Section 4.0 Summary that the remedy is protective.</p>
2	General	Groundwater monitoring results are presented in Section 2.7 and referenced tables and Appendices in the report. A number of MCL and RIDEM GA standard exceedances are reported. Please add a section on the interpretation of the groundwater monitoring data, including a figure showing how the concentrations of contaminants (e.g., arsenic) in wells with COC exceedances have changed since implementation of the remedy. Discuss whether the groundwater monitoring data supports that the remedy is protective and whether groundwater with contaminants above standards is migrating off-site.	<p>A section on interpretation of the groundwater data will be provided, to include an assessment COC migration off-site and that the remedy is protective.</p> <p>A tag map with call out boxes will be added to the report. The call out boxes will list COCs with exceedances of LTMP project action limits for all data from 1993 to present.</p>
3	General	A section should be added to the report to discuss the November 2007 maintenance activities. The November 2007 effort is referred to in several places in Section 3 of the report. In addition, the Landfill Corrective Action Plan in Appendix F identifies a number of activities that were conducted in November 2007 to address deficiencies identified during past landfill inspections. However, this is an important 2007 O&M effort and a separate section detailing the event and the activities that took place should be included in the text of the report. If there are any photos from the November 2007 maintenance activities documenting the corrective actions implemented, these should be included in the report.	For this report a brief section of bulleted items describing the November 2007 maintenance activities presented in Appendix F and elsewhere in the text will be added to the text.

Comment #	Location	Comment	Response
4	General	<p>There is no Facility Inspection Report form provided in Appendix F for the April 19, 2007 inspection. Therefore, observations of deficiencies and recommendations for corrective actions based on this inspection are not addressed in the Facility Deficiencies Report or the Landfill Corrective Action Plan. Deficiencies observed at the April 2007 inspection are noted at:</p> <ul style="list-style-type: none"> ➤ Page 3-2, Section 3.1 – bare spots around the top edge of the west side of the landfill; recommendation for repairing and re-sodding these areas; ➤ Page 3-4, Section 3.5 – a small erosion type channel cut across the road; and, ➤ Page 3-6, Section 3.8 – earth mounds around wells and vents were observed to have holes and ruts; recommendation for repair. 	A Facility Inspection Report and Corrective Action Plan will be developed and added to the final report for the April 19, 2007 storm event inspection.
5	Page 2-1, 2-2 and 4-1, Section 2.1 and 4.0	The text on page 2-1 indicates that units for hydrogen sulfide are in parts per million (ppm). However, text on pages 2-2 and 4-1 use the unit of percent. Please correct.	The text on pages 2-2 and 4-1 that shows the unit of percent for hydrogen sulfide will be revised to the unit parts per million (ppm).
6	Page 2-4, Section 2.4.3, Page 2-5, Section 2.4.4, and Appendix C	The text on pages 2-4 and 2-5 refers to the comparison of historical methane results and historical total hydrocarbon results tabulated in Appendix C. Appendix C has only the August 2007 data summary tables presenting all of the gas sampling analytical data. There are no historical data tables for methane or total hydrocarbon results. Please clarify the location of the historical information and provide in Appendix C.	A table will be included that details the ASTM 1945 and TO-12 TPH analytical results, since 2002. The reference to Appendix C will be removed from the text and this new table will be cited.
7	Tables 3-1, 3-2, & 3-3	Please refer to these tables in Section 3.9 and offer additional discussion on the data presented in these tables, if appropriate.	Tables 3-1, 3-2, and 3-3 will be cited in Section 3.9.
8	Appendix F, Facility Inspection Report	<p>a.) Landfill Cap Inspection component: One observation (consistent with text in Section 3.1) is of animal burrowing near GVR-105. This observation is not carried forward as a deficiency in the Facility Deficiencies Report. Note that comment 4 of EPA's comments on the Final 2006 Annual O&M Report (issued via email on January 16, 2008) discussed the animal burrowing deficiencies reported in the 2006 report and requested that, if similar findings were observed in 2007, that recommendations for monitoring and/or corrective actions be made. Since this concern was not carried forward as a deficiency again in this Draft 2007 O&M Report, no corrective actions are provided. Please consider whether corrective actions are warranted for this deficiency.</p> <p>b.) Landfill Cap Inspection component: Another observation reported here was that "settling points that appeared to have been bumped by mowing machinery previously did not appear to have been impacted</p>	<p>a.) The animal burrowing near GVR-105 will be further looked into to determine if this is considered a deficiency and to determine if corrective action is warranted.</p> <p>b.) The observation in the Landfill Inspection Report that "settling points that appeared to have been bumped by mowing machinery previously did not appear to have been impacted further" will be added to text in Section 3.1.</p> <p>c.) The following citation will be provided as a footnote, 2006 1st Semi-annual (10/19/2006) or as a footnote to the</p> <p>d.) Generally, the maintenance needed to be completed after the previous year's landfill inspection is finished prior to the following year's inspection. However, due to severe winter</p>

Comment #	Location	Comment	Response
		<p>further." This observation is not reported in Section 3.1 of the text.</p> <p>c.) Storm Revetment Beach Area Inspection component: The observations column here refers to corrective actions taken that were "noted in our previous report." Please provide a reference for the previous report cited here.</p> <p>d.) Note: Please clarify the meaning of the "Note" included at the end of the Facility Inspection Report.</p>	<p>storms (during winter 2006-2007) and at the request of the Navy the landfill inspection for 2007 was completed before the maintenance required by the 2006 was done.</p>
9	Appendix F, Landfill Corrective Action Plan	<p>a.) For item 1, the recommended action included the application of herbicide along the fence line. The description of the action performed does not discuss that herbicide was applied. What is the status of the recommendation for herbicide application?</p> <p>b.) Under the recommended actions for Item 4, it is noted that the possible hitting of the settling points with the mowing equipment could cause false settlement observations and should be noted in the settlement survey reports. Page 3-7, Section 3.9, does indicate that there was some evidence of impact at SP-003, but the implication of false settlement observations is not discussed here. Please clarify.</p> <p>c.) The recommended action for Item 2 is scheduled for Spring 2008. The 2008 Annual O&M Report will need to report on all corrective actions completed to address recommendations from the 2007 Landfill Correction Action Plan.</p>	<p>a.) Herbicide was applied along the fence line in November 2007. This will be added to the "action performed" column for item 1 in the Corrective Action Table.</p> <p>b.) A discussion of the possibility of false settlement observations for SP-003, due to the impact by the mowing equipment, will be added to the text on page 3-7 under Section 3-9.</p> <p>c.) The 2008 Annual O&M Report will report on all past corrective actions that occurred in 2008 or were scheduled to be performed in 2008.</p>

GOULD ISLAND DISCUSSION TOPICS

DRAFT FOR ONLY DISCUSSION

	RIDEM/EPA Comment	Navy Proposed Response	Comment
<p>SAMPLE ISSUES</p> <p>RIDEM Comment 17:</p> <p>SAP Work Sheet # 11 Identification of the Decision Statement Marine Sediment Extent of Contamination Page 35, 1 st Paragraph</p>	<p>Base upon the information presented in Figure 11.2 the majority of the sediment samples on the east side of the island are approximately 100-150 feet from the shore line. Overland flow, groundwater migration and releases from discharge pipes are the major routes of contaminant migration. Accordingly the Phase II samples need to be collected closer to the shore. Please relocate the proposed samples so that the majority of the samples are within fifty feet of the shore (unless a discharge pipe extended out more than fifty feet). Please relocate one sample to the following locations: immediately adjacent to Buildings 54, 38, 50. Collect two samples immediately east of the Riggers Storage Building and east of the transformer at the end of the north pier. A limited number of samples should be located within 50-150 feet of the shoreline. Any discharge pipes which were not sampled on the west or the east side of the island during the Phase I Investigation should be sampled in the Phase II. The location of the confirmatory samples for the Building 54 release should be depicted and samples should be collected adjacent to the removal area (one sample may be collected at depth within the removal area to ascertain if PCB contamination in the groundwater is affecting the sediments). Finally, at all locations, surface and subsurface samples should be collected.</p>	<p>Additional discussions on this subject are warranted. Please refer to the response to EPA comment No. 15.</p> <p>Sediment sample locations along the northeast shoreline where placed to adequately determine the extent of contamination detected during the Phase I RI sediment sampling. They also serve to fill any gaps in the coverage of the Phase I sediment sample locations.</p> <p>All located discharge pipes were sampled during the Phase I sampling effort.</p> <p>A map from the Background Summary Report can be provided which depicts the Building 54 confirmatory sample locations.</p> <p>Only surficial samples (0 to 6 inches) are proposed for the northeast and northwest shorelines. In the Stillwater Basin, four sample intervals are proposed.</p>	
<p>EPA Specific Comment 15, p. 39, Step 4:</p>	<p>Investigation of only the surficial subtidal sediment is not sufficient to characterize the extent of contamination and omission of sampling for intertidal sediment creates an apparent data gap in defining the extent of sediment contamination. Please include subsurface subtidal sediment sampling and intertidal sediment sampling here as well.</p>	<p>Subsurface subtidal sediment samples were collected during the Phase I RI. Only three samples contained exceedances of criteria. Based on previous sampling results, the characterization of contamination through the collection of surficial subtidal sediment samples along northeast and northwest shorelines should be sufficient.</p> <p>Additional discussion may be warranted regarding sampling the intertidal areas. Please refer to the response to RIDEM</p>	

GOULD ISLAND DISCUSSION TOPICS

		Comment 17.	
RIDEM Comment 52: SAP Work Sheet # 17 Sampling Design and Rational Ecological Sampling, Page 94,	<i>The report proposes using the reference station Potters Cove. Due to its location, and characteristics the reference station at Cranston Cove would appear to be the appropriate station. Please provide the necessary justification for the employing the reference station at Potters Cove in lieu of the reference station Cranston Cove or simply use Cranston Cove.</i>	The reason for using Potters Cove is because it has been used as a reference location in the past. There is less data available for Jamestown-Cranston Cove. The proposal to use this reference location will be considered.	
EPA Specific Comment 21. p. 51:	<i>EPA strongly recommends that the areas with highest historic metals contamination be sampled as part of the six "locations to be determined" in order to better correlate toxicity and contamination. Otherwise the challenges associated with resolving multiple stressor responses with limited data could lead to inconclusive results.</i>	The suggestion above is an acceptable approach. The six locations to be determined can be collected from the highest historic metals contamination. Additional discussion may be warranted in accordance with RIDEM comments.	
RIDEM Comment 11: Section 10.4 Risk Assessment Page 30, 6 th Paragraph	<i>As noted in previous correspondence, the Office of Waste Management has a number of concerns with respect to the ecological risk assessment, especially with respect to the identification of hot spots. It is the Office of Waste Management's position that these hot spots will be removed or otherwise remediated. As such, it will not be necessary to take additional samples in these areas as part of the Phase II Remedial Investigation. If this is not the case then additional samples should be collected.</i>	The comment is noted. Since the subject of the QAPP is the collection of additional samples, all discussion of remediation should be held until after these samples are collected.	
ANALYTICAL ISSUES			
RIDEM Comment 20: Sediment Stations, Extent of Contamination, Page 40	<i>Please indicate why the assessment endpoint <u>Cytochrome P 450</u> was not evaluated.</i>	Cytochrome P450 is sometimes used as a biomarker of exposure to various chemicals such as PAHs. This was conducted for site 19 (Derecktor Shipyard) but the limitations that were found were the availability of enough resident fish to provide a proper sample size. In a harbor environment the fish are more likely to be territorial, and on the island location, the fish tend to be more transitional. Additional discussions may be warranted if RIDEM feels this endpoint is merited.	

GOULD ISLAND DISCUSSION TOPICS

<p>RIDEM Comment 28: <i>Biota Tissue Concentration Endpoints</i> Page 45</p>	<p><i>The work plan discusses evaluating PCB concentrations in the tissue. Please confirm that all tissue samples will be analyzed for all of the chemicals of concern and evaluations will occur for all chemicals of concern.</i></p>	<p>Previous analysis of tissues from macroinvertebrates (bivalves) found limited contaminants in those tissues. This data was used to select analytes for the phase 2 remedial investigation. Additional tissue analyses are not warranted. Additional discussion can be held on this matter if needed.</p>	
<p>RISK ASSESSMENT ISSUES ✕</p>			
<p>RIDEM Comment 26: <i>Benthic Invertebrates End Points</i> Page 44.</p>	<p><i>The work plan proposes employing dose response curves to eliminate chemicals of concern. Toxicity is just one endpoint in the ecological risk assessment. Eliminating a contaminant based upon toxicity, when it is found to have an impact on tissue concentration or other matrixes will result in this contaminant not being identified as a contaminant of concern. Therefore, please eliminate this provision from the work plan.</i></p>	<p>The Navy believes that further discussion is warranted regarding this comment, which indicates a fundamental difference in how toxicity test data are used. Toxicity testing is conducted because chemical concentrations already exceed chemical-based criteria, which are based on scientific and literature studies. Because the criteria are very conservative and not based on site-specific data, toxicity testing is done to determine whether chemical concentrations are actually toxic to sediment invertebrates at the site.</p> <p>The position taken by RIDEM is in direct conflict with USEPA policy and Navy policy as well. If RIDEM is not willing to accept the results of the toxicity tests as a primary indicator of toxicity to benthic invertebrates, there is no reason to conduct the toxicity tests and no reason to proceed further in the ecological risk assessment process. Accordingly, no actions could be taken at the site based on ecological risks because it is against Navy policy to conduct a remedial action based solely on literature-based ecological screening criteria. RIDEM is requested to reconsider the comment and take part in a technical discussion between the risk assessors on this matter.</p>	

GOULD ISLAND DISCUSSION TOPICS

<p><u>EPA Specific Comment 17. p. 41, 14:</u></p>	<p><i>The proposed interpretation of the Leptocheirus test is not acceptable. The laboratory control is only intended for determining whether the test organisms and procedures were acceptable, not for comparison with site samples. All comparisons should be made to the reference mean. The proposed approach would allow various combinations of comparisons to the reference stations with the lowest survival, growth, or reproduction, which is not acceptable. EPA does not accept the arbitrary rules for growth and reproduction involving the use of pooled reference data in some cases and individual reference stations in other cases. The 20 percent difference rules are also arbitrary and should be avoided. EPA recommends standard toxicity test interpretation protocols without applying arbitrary standards to these tests. Finally, the visual inspection of toxicity vs. chemical concentration may not be sufficient to identify any relationship between toxicity and contamination. Use of ERM-quotients for chemical groups may be useful as an additional check. A multivariate statistical approach may also be needed.</i></p>	<p>It is standard practice to compare the results of the site samples from toxicity tests to the results of the laboratory control samples. In fact, Section 12.2.1 of the USEPA <u>Method for Assessing the Chronic Toxicity of Marine and Estuarine Sediment-associated Contaminants with the Amphipod <i>Leptocheirus plumulosus</i></u>, First Edition, states that "Statistical methods are used to make inferences about populations, based on samples from those populations. In most sediment toxicity tests, test organisms are exposed to contaminated sediment to estimate the response of the population of laboratory organisms. The organism response to these sediments is usually compared with the response to a control or reference sediment." Therefore, it is not clear why USEPA does not believe it is acceptable to compare the site samples to the laboratory control samples. Also, it is not clear why all comparisons must be made to the reference mean. Typically, the statistical comparisons are made on a sample by sample basis and each site sample is compared to each reference sample. Because of USEPA comments on another site in Region 1, the Navy agreed to compare the mean growth of each site sample to the mean growth of the combined reference sample data set to determine the magnitude of the risk, as discussed in the fourth bullet on page 43. This was not done arbitrarily.</p> <p>Please provide guidance for comparing each site sample to the pooled reference sample set. The 20 percent rules have been used on other risk assessments reviewed by USEPA without comments.</p> <p>While the Navy agrees to include ERM-quotients for chemical groups as an additional check for evaluating the toxicity test data, a concern with this approach is that different chemicals in each sample may be responsible for the ERM-quotient value in different samples, thus making it difficult to determine</p>	
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GOULD ISLAND DISCUSSION TOPICS

		appropriate cleanup levels, if they are needed.	
<p>EPA Letter Comment 2:</p>	<p><i>The Leptocheirus test is probably the strongest line of evidence for benthic risk. However, the proposed interpretation criteria include a number of arbitrary cut-offs, as well as inappropriate comparison with laboratory controls over reference stations. Plotting toxicity and chemistry data and looking for a visual cue to eliminate contaminants is not likely to be worthwhile. A multivariate statistical approach may be needed, or a variety of approaches for identifying dose-response relationships. There are too many variables and too few measurement points to provide a straightforward answer by simply plotting the data chemical by chemical, as discussed in Attachment A.</i></p>	<p>Please see the Navy's response to Specific Comment No. 17. Additional discussions may be needed. Please suggest the type of multivariate statistical approach or other approaches for identifying dose-response relationships that EPA believes may be more appropriate than the method presented in the QAPP.</p>	
<p>EPA Letter Comment 3:</p>	<p><i>In Figure 11-4, the decision tree flow chart for ecological sampling (part 2) shows a consistent trend of using the least conservative approach for the Baseline Ecological Risk Assessment. For example, it is stated under the benthic invertebrate toxicity testing portion of the flow chart that COCs will be compared to the LOEC instead of the NOEC. Comparison to the NOEC would be more conservative. Additionally, it is stated under the piscivorous wildlife portion of the flow chart that average tissue concentrations will be used in the food chain modeling. Use of maximum concentrations is more conservative. EPA recommends a more conservative approach for the BERA to ensure that the identified assessment endpoints are realized</i></p>	<p>Additional discussion on this is warranted. Typically, it is common to adopt the most conservative values available when screening contaminants for inclusion in the risk assessment. However, when actually identifying the risk to the receptors, it may not be appropriate to simply adopt the most conservative approach on all the variables. This is because these risks are used to establish the PRGs, and if the risk is based on a series of well intentioned but highly conservative factors, a larger than appropriate area (in some cases prohibitively large) may be identified for remediation. Discussion should be held to identify where more conservatism is appropriate so that an overly conservative estimation of risk is not estimated.</p>	

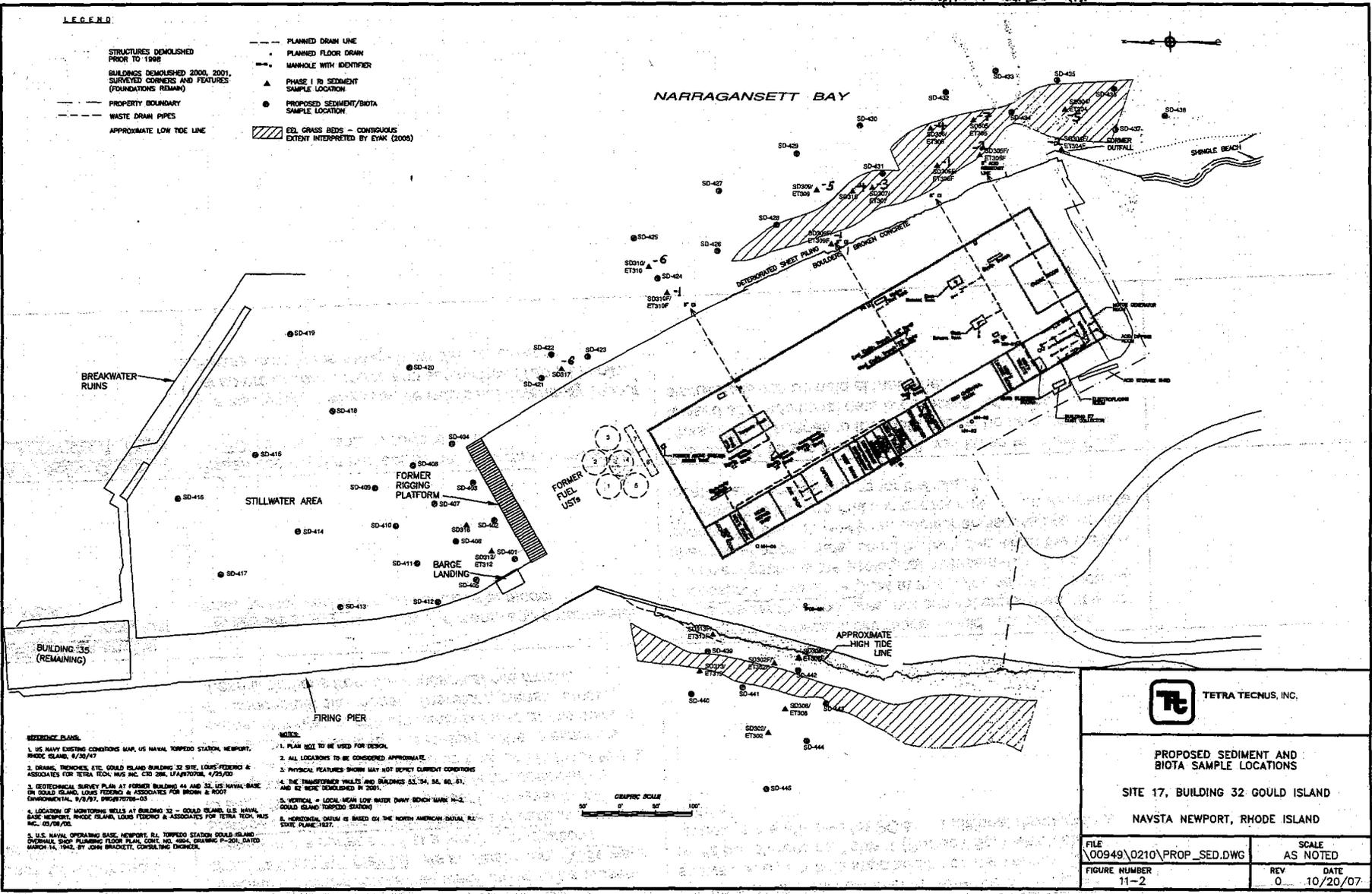
GOULD ISLAND DISCUSSION TOPICS

CONCEPTUAL SITE MODEL		
<p><u>RIDEM Comment 58:</u> Appendix A Conceptual Site Model</p>	<p><i>The conceptual site model eliminates a number of potential exposure routes that were known to be present at the site and still may be. As an illustration, PCBs were present in the surface soil at a number of locations. Surface soil samples will be collected at various locations to ascertain if PCBs are still present, however in the conceptual site model surface soil is not consider an exposure route. The same holds true for TPH and PAHs. As the above illustrates, it is inappropriate to eliminate exposure routes or contaminants sources at this point in the conceptual site model. Therefore, please remove these limitations from the conceptual site model.</i></p>	<p>It is unclear what this comment is referencing. Figure 8-3 shows soil as a media impacted by contaminants. Comment could be referencing Table 1 (Surface Soil) which stated no receptors are affected for PCBs. Additional discussion is needed.</p>
<p><u>RIDEM Comment 59:</u> Appendix A Conceptual Site Model</p>	<p><i>Residential exposure to soil, sediments and groundwater must be included in the conceptual site model</i></p>	<p>The current conceptual site model would only consider future residential exposures, not current exposures. It is not necessary to revise the CSM at this point, since the focus of the investigation is the ecological assessments. Such changes (if appropriate) could be included when the CSM is updated for the FS. However, additional discussions would be needed to be sure that it is appropriate, given the remote location and access issues for the island.</p>
<p><u>EPA Specific Comment 26. Appendix A, Table 1:</u></p>	<p><i>Please add human and ecological receptors as receptors for PCB contaminants in surface soil.</i></p> <p><i>It is also unclear why cyanide would not potentially impact receptors in both surface and subsurface (Table 2) soils. Please explain the rationale for this conclusion.</i></p>	<p>The conceptual site model (CSM) was taken from the Final Phase I RI. Changes to the CSM should be held until it is revised after additional data is collected. Additional discussions can be held at that time.</p>

Water Depth: Ft Mean Low Water

LEGEND

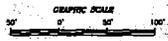
- STRUCTURES DEMOLISHED PRIOR TO 1996
- BUILDINGS DEMOLISHED 2000, 2001, SURVEYED CORNERS AND FEATURES (FOUNDATIONS REMAIN)
- PROPERTY BOUNDARY
- WASTE DRAIN PIPES
- APPROXIMATE LOW TIDE LINE
- PLANNED DRAIN LINE
- PLANNED FLOOR DRAIN
- MANHOLE WITH IDENTIFIER
- ▲ PHASE I BI SEDIMENT SAMPLE LOCATION
- PROPOSED SEDIMENT/BIOTA SAMPLE LOCATION
- ▨ CO. GRASS BEDS - CONTIGUOUS EXTENT INTERPRETED BY EYAK (2005)



REFERENCE ISLANDS

1. U.S. NAVY EXISTING CONDITIONS MAP, U.S. NAVAL TORPEDO STATION, NEWPORT, RHODE ISLAND, 8/20/47
2. DRANS, DIMICKS, ETC. GOULD ISLAND BUILDING 32 SITE, LOUIS FEDERICO & ASSOCIATES FOR TETRA TECH, INC. CRD 288, UFA/870708, 4/23/00
3. GEOTECHNICAL SURVEY PLAN AT FORMER BUILDING 44 AND 32, U.S. NAVAL-BASE RI GOULD ISLAND, LOUIS FEDERICO & ASSOCIATES FOR TETRA TECH, INC. ENVIRONMENTAL, 9/8/97, DR08720708-03
4. LOCATION OF MONITORING WELLS AT BUILDING 32 - GOULD ISLAND, U.S. NAVAL-BASE NEWPORT, RHODE ISLAND, LOUIS FEDERICO & ASSOCIATES FOR TETRA TECH, INC., 03/08/02
5. U.S. NAVAL OPERATING BASE, NEWPORT, RI, TORPEDO STATION GOULD ISLAND OVERHAUL SHOP FLOORING FLOOR PLAN, CORN. NO. 99A, DRAWING P-200, DATED MARCH 14, 1942, BY JOHN BRACKETT, CONSULTING ENGINEER.

- NOTES**
1. PLAN NOT TO BE USED FOR DESIGN.
 2. ALL LOCATIONS TO BE CONSIDERED APPROXIMATE.
 3. PHYSICAL FEATURES SHOWN MAY NOT REFLECT CURRENT CONDITIONS.
 4. THE TRANSFORMER WELLS AND BUILDINGS 41, 34, 34, 44, 41, AND 42 WERE DEMOLISHED IN 2001.
 5. VERTICAL = LOCAL MEAN LOW WATER (DAWN BEACH MARK N-2, GOULD ISLAND TORPEDO STATION)
 6. HORIZONTAL ORDER IS BASED ON THE NORTH AMERICAN DATUM 83 STATE PLANE 1827.



PROPOSED SEDIMENT AND BIOTA SAMPLE LOCATIONS
SITE 17, BUILDING 32 GOULD ISLAND
NAVSTA NEWPORT, RHODE ISLAND

FILE 00949\0210\PROP_SED.DWG	SCALE AS NOTED
FIGURE NUMBER 11-2	REV DATE 0 10/20/07