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LETTER AND U S NAVY RESPONSE TO RHODE ISLAND DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT COMMENTS REGARDING DRAFT STUDY AREA SITE
EVALUATION SITE 11 TANK FARM 3 NS NEWPORT RI
01/13/2011
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January 13, 2011

Project Number G02710

Mr. Gary Jablonski, Remedial Project Manager
Rhode Island Department of Environmental Management
235 Promenade Street
Providence, Rhode Island 02908-5767

Reference: CLEAN Contract No. N62470-08-D-1001

Subject: Response to Comments on Draft SASE
IR Site 11, Tank Farm 3
Naval Station Newport, Rhode Island

Dear Mr. Jablonski:

On behalf of Mr. Roberto Pagtalunan, US Navy NAVFAC, I am providing to you the response to RIDEMs September 17, 2010 comments on the Draft Study Area Site Evaluation (SASE) for the site referenced above.

If you have any questions, please do not hesitate to contact me at 978-474-8445.

Very truly yours,



Dabra I. Seiken, CG, PG
Project Manager

Enclosures

Cc: R. Pagtalunan, NAVFAC (w/encl. -1)
R. Lim, USEPA (w/encl. -1)
G. Glenn, TtNUS (w/o encl.)
P. Golonka, Ganett Fleming (w/encl. -2)
D. Moore, NAVSTA (w/encl. -1)
Site File (c/o G. Wagner TtNUS -1 CD)
File 112G02170 (8.0 w/encl.), 3.1 (w/o encl.)

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**NAVY RESPONSES TO RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
(RIDEM)
COMMENTS (DATED SEPTEMBER 17, 2010)
DRAFT STUDY AREA SCREENING EVALUATION (SASE) FOR TANK FARM 3
NAVAL STATION NEWPORT, RHODE ISLAND**

Navy responses to the RIDEM comments on the Draft SASE, Tank Farm 3, Naval Station Newport, Rhode Island (July, 2010) are presented below. The RIDEM comments are presented first (in italics) followed by Navy's responses.

COMMENTS

1. Paragraph 2: *..., it would seem prudent to clarify the following: Category 1 will still have to meet RIDEM regulatory requirements; and Category 2 and 3 areas are subject to all applicable RIDEM regulatory requirements. Also, please be advised that independent of the recommendations in the report, RIDEM will determine which regulatory programs and requirements are applicable to each category and area of concern.*

Response: Comment noted.

2. Paragraph 3: *...Due the Defense Logistical Agency (DLA) constraints to keep this burn pit intact, it was not possible to investigate for releases beneath the structure or along the length of pipes entering and exiting the structure. Further, investigations of the terminus of the discharge pipe, while planned and discussed with all parties at the time, have not been implemented to date. These investigations need to be conducted in order to determine the appropriate remedial action for this burn pit.*

Response: While work has been done to characterize AOC001 contamination, Navy agrees to collect additional soil samples for further characterization of this AOC.

3. Paragraph 4. *....As a result of this approach, and as noted in previous meetings and correspondence, additional work is necessary which is consistent with previous plans and agreements for the Site. Therefore, this Office does not concur with a number of the recommendations and conclusions in the SASE with respect to areas of concern in the Category 2 & 3 areas. Please retain these 5 bullets in Section 6.3 for additional investigational activities to be performed. As these areas were and are proposed to continue under the RIDEMs jurisdiction, this Office will continue to work with the Navy on the remaining investigations and remediation needed to be conducted at this Site.*

Response: Section 2 of the Draft SASE explains how the five bullets in Section 6.3 were generated. The areas in these five bullets have been adequately investigated and/or remediated to below regulatory criteria and Navy does not believe that additional investigation or remediation is warranted.