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U S NAVY LETTER REGARDING DRAFT SAMPLING AND ANALYSIS PLAN FOR DATA
GAPS INVESTIGATION SITE 9 NS NEWPORT RI
09/20/2011
NAVFAC MIDLANT



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND, MID-ATLANTIC
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NORFOLK, VA 23511-3095

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OPTE3/18/WAJ
20 Sep 2011

Ms. Pamela Crump, Sanitary Engineer
Office of Waste Management
Rhode Island Department of Environmental Management
235 Promenade Street
Providence, Rhode Island 02908-5767

Dear Ms. Crump:

SUBJECT: DRAFT SAMPLING AND ANALYSIS PLAN FOR THE DATA GAPS
INVESTIGATION AT SITE 19, NAVAL STATION, NEWPORT
NAVAL STATION NEWPORT, RHODE ISLAND

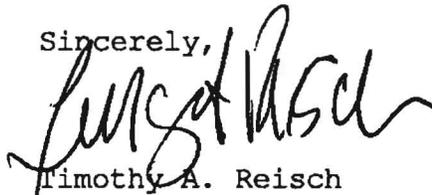
This is in response to your letter of September 7, 2011 indicating disapproval of the approach outlined in the Draft Sampling and Analysis Plan for the Data Gaps Investigation for Site 19, Former Derecktor Shipyard located at Naval Station Newport, Rhode Island. As provided in Appendix C of this plan, several meetings were held and agreement from the Newport Team, consisting of members from the Navy, Environmental Protection Agency and from your office, was reached to proceed with a data gaps investigation at this site. It is unclear why Rhode Island Department of Environmental Management (RIDEM) sent this letter, which doesn't comport with the approach to which we believe RIDEM and the rest of the team agreed, during team meetings on October 27, 2010, November 11, 2010 and December 14, 2010.

As discussed during these meetings, the purpose of this investigation is to collect data to support remedial decision-making in portions of the study area that are affected by site related contaminants. This information is required to support remedy selection and design, and will be fully evaluated in either an Engineering Evaluation/Cost Analysis or revised Feasibility Study. As this will provide input or feed into a future primary document, this Plan is a secondary document in accordance with the Newport Federal Facilities Agreement (FFA). The Navy believes that we have appropriately responded to your comments on this document, as provided in Tetra Tech letter dated August 8, 2011 and will move forward with this data gaps investigation, which is necessary to complete the identification of appropriate alternatives for this site.

Clarification is provided in the enclosure in response to comments 7, 13, and 14. The Navy recognizes that RIDEM believes there are unresolved issues with regard to the subject document. In acknowledgment that a future primary document (Engineering Evaluation/Cost Analysis or revised Feasibility Study) and selection of the remedy is required, the Navy believes these issues will be resolved in the future development of those documents.

If you have any questions regarding this information, please contact Ms. Winoma Johnson at (757) 341-2008.

Sincerely,



Timothy A. Reisch
Northeast IPT
Environmental Business Line
Team Leader
By direction of the
Commanding Officer

Enclosure

Copy to:

Ms. Kymberlee Keckler (EPA)
Ms. Darlene Ward (NAVSTA Newport)
Mr. Steve Parker (Tetra Tech)

**Further Clarification Response to RIDEM Letter 9/7/11
Derecktor Shipyard Draft SAP and Response to Comments**

Comment no. 7:

Regarding the evaluation of response to comment no. 7, it should be clarified that for this project, Project Action Limits (PALs) are set equivalent to the Recommend PRGs (RPRGs). These values are easily achievable using the methods cited in worksheet 15. However, in the unlikely event that interference or a dilution results in an LOD that exceeds the PAL, the resulting reported concentration would be considered a positive detection at one half the non-detected result (one half the resulting LOD). This is standard practice in the evaluation of data of this type. In extreme cases, where the non-detected result exceeds 1000x the LOD, or if the sample result is rejected during data validation for some other reason, the sample would be considered a data gap and the team would have to determine if re-sampling is required. Section 11.2 will be revised to reflect this clarification.

Comment No. 13:

Regarding the evaluation of response to comment 13, it appears that the original comment from RIDEM was misinterpreted. The original comment states "...the results from analytes, such as PAHs which do not have PRGs, will also be included in tables in the Data Gaps Investigation report." RIDEM is correct that concentrations of HMW PAHs and PCB Aroclors that do not have PRGs will be reported by the laboratory for the purposes of deriving total PAH and total PCB values for which there are PRGs. Therefore these values will be published in the report for that purpose.

Comment No. 14:

Regarding the evaluation of response to comment 14, the evaluation recommends setting PALs to levels below the Baseline PRGs (BPRGs). In response, it is noted that the LODs, detection limits and other criteria sought by the analytical laboratories (see worksheet 15) are well below BPRGs, and these levels are likely to be reached, notwithstanding matrix interferences. For this project, these interferences will be addressed as described in the evaluation of response to comment no. 7, above.

Enclosure