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EMAIL REGARDING U S FISH AND WILDLIFE REVIEW AND COMMENTS ON DRAFT
PROPOSED PLAN AT SITE 8 NETC NEWPORT RI
5/21/2012
U S FISH AND WILDLIFE

Ropp, Jim

From: Kenneth_Munney@fws.gov
Sent: Monday, May 21, 2012 10:26 AM
To: Maritza.Montegross@navy.mil; Ropp, Jim
Cc: Lombardo.Ginny@epamail.epa.gov; hoskins.bart@epamail.epa.gov
Subject: Re: NAVSTA Newport Site 8 (NUSC) Proposed Plan (draft)

Categories: Newport

Maritza/Jim,

Thank you for the opportunity to comment on the Proposed Plan for the NUSC site. The following are brief technical comments on the plan:

Site Background and Characterization:

What caused the contamination at Site 8: It would be helpful to further explain the specifics regarding "an accident in the Building 179 area...", relative to date, COC involved, quantities, etc. from the accident and UST.

What were the investigation results: The term 'COC' could be included to be consistent with the Risk Assessment.

Where are the Site 8 contaminants located: It would be helpful to state for soils and sediments if contamination is present in surface and/or subsurface depths.

Removal Actions at Site 8: COCs should be provided for these Removal Actions unless removals were based on limit of sight only with no analysis, which seems unlikely. It should also be stated if NTCR Actions were anticipated to have follow-up investigations or further removal actions, as implied, and if so, how this ties in with the PP.

Human Health Risks:

Step 1: The term 'COPCs' could be used for Chemicals of Potential Concern, after initial use, to be consistent with the Risk Assessment.

Please clarify if the petroleum is actually crude oil, heating fuel, etc.

Ecological Risks:

Step 1: The term 'COPC' is appropriate

Cleanup Objectives:

Sediment: Clarify "and overall toxicity levels to aquatic organisms...."

Use of the term 'RAOs' for Remedial Action Objectives is suggested, in lieu of Cleanup Objectives.

Provide a table of PRGs in support of human health and ecological RAOs.

5th RAO bullet: It seems more appropriate for this to reflect surface water transport, not GW transport.

Summary of Cleanup Alternatives:

Soil Alternative SO2: Clarify if leachability standards are federal and/or state standards. Describe final disposition of PAH LTTD treated soils. Provide fill details and final soil cover maintenance similar to SO3.

Soil Alternative SO3: Clarify if leachability standards are federal and/or state standards. We assume excavation would occur first for all soils exceeding leachability criteria, so it would make more sense to mention this first,

before capping/soil cover.

Soil Alternative SO4: Clarify if leachability standards are federal and/or state standards. Clarify if the South Meadow area would be suitable for continued industrial use. Provide fill details and final soil cover maintenance similar to SO3.

Sediment Alternative SD4: Post-removal confirmational sampling may be advised to verify remedial goal attainment.

Common Elements:

Post-removal geophysical screening may be advisable after previously identified geophysical anomalies are removed.

5-year reviews: Identify this as "Monitoring" to be consistent with the Alternatives. Near-term monitoring will also be required for restored habitat areas in the stream and pond that are impacted by remedial activities.

Preferred Action Alternatives:

It would be beneficial to also state that restoration will occur in the pond and stream to aid "the ecological community to re-establish itself...."

Figures: It would be helpful to include the PRG level for all categories on all figures.

Figure 5: It would be helpful to state or color-code the COCs above sediment PRGs for each area.

We will probably provide formal agency comments during the public comment period; however, we do not anticipate substantial issues with the PP, as presented.

Please let me know if you have any questions on the above comments. We look forward to further progress on the NUSC remedy.

Best regards,

Ken

Ken Munney

USFWS

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04/30/2012 03:38 PM

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Subject NAVSTA Newport Site 8 (NUSC) Proposed Plan (draft)

Ginny, Pam -

Attached, please find the draft Site 8 Proposed Plan for your review. Hardcopies are being sent via overnight FedEx as indicated in the attached transmittal letter.

We would like to discuss any major comments during the May 16 RPM meeting. Remaining comments are requested by May 25.

Note that some of the figures were taken directly from the draft final FS which is being prepared concurrently with this Proposed Plan. Those figures don't fit as well into the Proposed Plan format, so we will further clarify/simplify them for the next version of the Proposed Plan.

Thanks,

Jim Ropp, P.E. | Project Manager

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[attachment "Transmittal Letter.PDF" deleted by Kenneth Munney/R5/FWS/DOI] [attachment "NAVSTA Newport Site 8 NUSC PRAP (draft).pdf" deleted by Kenneth Munney/R5/FWS/DOI]