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LETTER AND NATIONAL OCEANIC AND ATMOSPHERIC ADMINISTRATION COMMENTS  
ON DRAFT FINAL FEASIBILITY STUDY SITE 17 GOULD ISLAND NS NEWPORT RI  
2/15/2013  
NATIONAL OCEANIC AND ATMOSPHERIC ADMINISTRATION



**U.S. DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Admin.**  
National Ocean Service  
Office of Ocean Resource Conservation and Assessment  
Hazardous Materials Response and Assessment Division  
c/o EPA Office of Site Remediation and Restoration (HIO))  
5 Post Office Square, OSRR-07-1  
Boston, MA 02109  
15 February 2013

Ms. Maritza Montegross  
NAVFAC MIDLANT (Code OPNEEV)  
Environmental Restoration  
Building Z-144, Room 109  
9742 Maryland Avenue  
Norfolk, VA 23511-3095

Dear Maritza:

Thank you for the Draft Final Feasibility Study for Site 17, Gould Island, Naval Station Newport, Newport, RI, dated December 2012. NOAA's interest concern Offshore Alternatives for Sediment that includes SD 1, 2, 3 and 3A. Comments are numbered below.

1. Given that SD 1 is summarily eliminated, the most important decision concerns the use of a cap (SD 2) or a dredge (SD 3, 3A) to eliminate the risk at the Stillwater area. Section 5.22 (bottom of Page 5-11 – top of Page 5-12) states that the 2 foot sand cap should remain stable as shown by the sediment transport model. I am not certain but I would think that a strong long duration east wind (i.e., northeaster) would have enough fetch to set up some large waves that could rip into the sand cap. I would need further assurance that this capping remedy is permanent.
2. A typo of sorts at the top of page 5-12, last sentence starting with "Although" and ending with "sediments". Note the words "it increased".
3. I am puzzled by the inclusion of Habitat Restoration as a part of Alternative SD 3A. That because I cannot find any mention of it in Section 5.1.4. I notice at the bottom of Page 5-8 there is a brief mention about mitigation if the eel grass is removed but mitigation is not restoration. I would like to see habitat restoration although it sounds as if this needs further clarification
4. I do not follow the cubic yards planned for removal adjacent to the Northeast Shoreline as described on Page 5-8 (SD 3A). The text shows 846 cubic yards while the table adds up to 361 cubic yards. An estimate greater than twice the quantity of sediment in place due to sloughing and overdredge allowance seems excessive to me.
5. I would request that the Navy discuss the removal of the eel grass (SD 3A) where PRGs are exceeded (SD 305 and SD 304) in the Northeast area with the State and Federal Trustees. That because, it may be wiser to leave the eel grass if contamination is low unless we are sure it will provide an attractive nuisance to benthic and aquatic natural resources. In fact the concentrations at SD 305 and SD 304 are comparatively modest when compared to other site locations showing an exceedence of the sediment PRGs.

This could halve the amount of sediment necessary for dredging at the Northeast Shoreline area.

6. The author's use of area units jumps around within the text. For example Section 5.2.4 uses acres while the table on Page 5-8 uses square feet.
7. Page 5-5 tells us to look on Figures 2-8 and 5-1 to see the Stillwater Area excavation area. But Figure 2-8 does not. Note Figures 2-3 to 2-7 do so based on specific depths while 5-1 provides a summary view.

Please contact me with any questions or comments.

Sincerely,

Kenneth Finkelstein, Ph.D

CC: Pamela Crump (RIDEM)  
Stephen Parker (Tetra Tech)  
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