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LETTER AND RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
RESPONSES TO U S NAVY RESPONSES TO COMMENTS ON DRAFT FINAL FEASIBILITY  
STUDY DECISION UNIT 5-1 TANK FARM 5 SITE 13 NS NEWPORT RI  
*2/7/2013*  
RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT



RHODE ISLAND  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

7 February 2013

Roberto Pagtalunan  
NAVFAC MIDLANT (Code OPTE3)  
Environmental Restoration  
Building Z-144, Room 109  
9742 Maryland Avenue  
Norfolk, VA 23511-3095

Re: Response to Comments  
Draft Final Feasibility Study  
Decision Unit 5-1 at Tank Farm 5 – Site 13

Dear Mr. Pagtalunan,

The Office of Waste Management at the Rhode Island Department of Environmental Management has conducted a review of the Navy's response to RIDEM's comments on the *Draft Final Feasibility Study* dated September 2012 for Decision Unit 5-1 at Tank Farm 5 - Site 13, Naval Station Newport, located in Newport, RI. As a result of this review, this Office has generated the attached responses.

If you have any questions in regards to this letter, please contact me at (401) 222-2797, extension 7020 or by e-mail at [pamela.crump@dem.ri.gov](mailto:pamela.crump@dem.ri.gov).

Sincerely,

Pamela E. Crump, Sanitary Engineer  
Office of Waste Management

cc: Matthew DeStefano, DEM OWM  
Richard Gottlieb, DEM OWM  
Gary Jablonski, DEM OWM  
Kymberlee Keckler, EPA Region I  
Deb Moore, NSN  
Steve Parker, Tetra Tech

**RIDEM's Evaluation (2/7/13) of the  
Navy's Responses (1/10/13) to RIDEM's Comments (10/22/12)  
Draft Final Feasibility Study  
for Decision Unit 5-1 at Site 13 - Tank Farm 5  
Naval Station Newport, RI**

**Specific Comment 1: Page ES-3, Executive Summary; groundwater alternatives.**

*The Navy has not demonstrated to date that monitored natural attenuation (MNA) is a viable remedial alternative at this site. To show that natural attenuation of metals is occurring at this site, the Navy must have multiple rounds of groundwater data with seasonal variances showing decreasing trends. The summary of geochemistry information provided in Appendix A-5 is not enough to prove that MNA will be effective for this site. Therefore, please include an additional groundwater alternative in this FS (i.e., in situ treatment).*

**Navy's Response:**

The actual timeframe for groundwater quality at DU 5-1 to achieve concentrations below the PRGs has not been demonstrated through currently available data. A trend analysis from additional data collected during sampling efforts proposed during the MNA activities under alternative GW2 (as part of the 5-year review process) will provide the supplemental data necessary to estimate the length of time MNA would be required to achieve groundwater quality objectives at DU 5-1.

In-situ treatment via a chemical injection process to neutralize inorganics will be added as a groundwater treatment alternative (GW3) throughout the appropriate sections of the Final FS.

RIDEM's Evaluation of Response:

*Please note that the Office of Waste Management has never concurred with a Record of Decision (ROD) which includes an MNA remedy for groundwater without sufficient existing MNA data showing a decreasing trend at a site. Please explain why the Navy plans to conduct the MNA program as a pre-design investigation after the ROD rather than a data gap investigation prior to the ROD. RIDEM would prefer to have the data upfront rather than after a remedy is chosen for the Site. Please consider conducting the MNA program prior to the issuance of the ROD.*

**Specific Comment 5: Page 5-2, Section 5.1.2, Alternative GW2, MNA; 4th paragraph.**

*"In order to provide documentation of the attenuation, an annual monitoring schedule is appropriate for the first five years, and if a trend of COC reduction appears evident, reduction to one monitoring event every five years would be adequate in order to support the 5-year review documentation."*

*Please see comment #1. Please revise this statement to state that quarterly monitoring is appropriate for the first several years to show seasonal trends.*

**Navy's Response:**

The first sentence in the 4th paragraph of Section 5.1.2 will be revised in the Final FS to "In order to demonstrate the effectiveness of natural attenuation, a quarterly groundwater quality monitoring program is appropriate for the first two years to define seasonal trends, if any. Further monitoring would likely be annual. Once a trend in groundwater quality has been established, the Navy will propose a change in monitoring frequency to the EPA and RIDEM for review and approval."

Details of the long-term monitoring will be finalized when the long-term monitoring plan is developed.

*RIDEM's Evaluation of Response:*

*Please do not include the sentence "Further monitoring would likely be annual" in the above statement. Also, please see specific comment #1.*