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TRANSMITTAL LETTER AND RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL
MANAGEMENT COMMENTS ON THE REDLINE DRAFT FINAL FEASIBILITY STUDY FOR
OPERABLE UNIT 6 (OU 6) SITE 17 FORMER BUILDING 32 GOULD ISLAND NS NEWPORT

RI

11/6/2013

RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

6 November 2013

Ms. Maritza Montegross
NAVFAC MIDLANT (Code OPTE3)
Environmental Restoration
Building Z-144, Room 109
9742 Maryland Avenue
Norfolk, VA 23511-3095

Re: Redline Feasibility Study (August 2013)
Site 17, Former Building 32 - Gould Island, NETC

Dear Ms. Montegross,

The Office of Waste Management at the Rhode Island Department of Environmental Management has conducted a review of the *Redline Feasibility Study*, dated August 2013 for Former Building 32 – Gould Island (Site 17), Naval Station Newport, located in Newport, RI. As a result of this review, this Office has generated the attached comments on the *Redline Feasibility Study*.

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.

Sincerely,

Pamela E. Crump, Sanitary Engineer
Office of Waste Management

cc: Matthew DeStefano, DEM OWM
Richard Gottlieb, DEM OWM
Gary Jablonski, DEM OWM
Deb Moore, NSN
Kymberlee Keckler, EPA Region I
Ken Finkelstein, NOAA
Ken Munney, USF&WS
Steve Parker, Tetra Tech

**RIDEM Comments (11/6/13) on the
Redline Feasibility Study (8/27/13) for
Site 17 – Former Building 32, Gould Island
Naval Station Newport, Newport, RI**

General Comments:

1. Former Building 44 Underground Storage Tanks

As indicated in RIDEM's comments on the Draft Final FS, the State was concerned that the debris remaining in the five former underground storage tanks (USTs) at Building 44 was not clean fill and would therefore be considered solid waste that would need to be addressed by the CERCLA remedy. However, RIDEM was able to find documentation indicating that these five tanks should in fact be considered closed out under RIDEM's regulations. Although only two of the five tanks are documented as being officially closed out, it appears that all five tanks should have included. This error will be corrected in the UST files. Also, it appears that sampling of the fill material was conducted and the results met RIDEM's residential criteria. Therefore, RIDEM believes the former USTs at Building 44 are no longer an issue and no further action is required.

2. MNA for Manganese

The Navy sent revised flushing calculations on October 29, 2013 which provided new estimates for the time for manganese in groundwater to reach PRGs with monitored natural attenuation (MNA). As indicated in RIDEM's email on November 1, 2013, the State concurs with this approach assuming that the sampling program will include obtaining additional hydraulic conductivity data from Gould Island during its implementation which can be used to further refine these estimates by the first 5-year review.

Specific Comments:

1. p. ES-6, Alternative SO2, 4th bullet (revised).

Please remove "*annual*" from this statement. RIDEM would require more frequent sampling for MNA purposes.

2. p. ES-6, Alternative SO3, 2nd bullet (revised).

"*Leachability Criteria*" was changed to "*Leachability concentrations*." This modification does not make sense in this context. How does one define "*Leachability concentrations*"? This bullet should state that vadose zone soils exceeding Leachability Criteria (as outlined in RIDEM's Remediation Regulations) would be addressed. Please undo this language modification.

3. p. ES-7, Alternatives SD2 and SD3, last bullet.

As RIDEM has suggested previously, it may be prudent to leave the option open for continued monitoring along the Northeast Shoreline if the PDI indicates that further remedial action is necessary. Based on the results of the PDI, the team would decide whether monitoring or dredging would be the best alternative to address this area if needed.

4. p. 1-2, Section 1.0, last paragraph.

Since TPH is commingled with CERCLA contaminants at this Site where there is a CERCLA risk, and TPH will be addressed as part of the remedial action work plan stage, this FS should clearly indicate where exceedances of the RIDEM Direct Exposure Criteria (industrial and residential) for TPH are located. Exceedances of the residential DEC for TPH should be included to determine the boundaries for the land use controls for this Site. Please ensure that this FS discusses all TPH exceedances where TPH is commingled with CERCLA contaminants. In addition, please state that any areas where TPH is not commingled with CERCLA contaminants will be addressed as Category 2 Areas similar to other sites at Naval Station Newport.

5. p. 2-4, Section 2.1.4.1, Soil; 1st paragraph.

Please remove *“based on the federal groundwater classification”* from the 2nd sentence. This paragraph is discussing the State’s leachability criteria which are soil-based regulatory criteria based on the State’s groundwater classification. Please explain why *“and leachability”* was deleted from the 5th sentence. Site concentrations should be compared to direct exposure and leachability soil criteria.

6. p. 2-8, Section 2.2.1, Identification of Media of Concern; 1st bullet.

Please explain why this bullet was modified to indicate that soil is only a media of concern due to exceedances of leachability criteria. Leachability is not the only concern for soil; the risk is unacceptable from other exposure routes (i.e., direct contact). Please undo this modification.

7. p. 2-8, Section 2.2.1, Identification of Media of Concern; last bullet.

Please explain why *“and TPs”* was deleted. The contaminated water contained within test pits is discussed throughout this FS.

8. p. 2-18, Section 2.4, 4th bullet.

Please explain why part of this bullet was deleted. Will the actual depth of contamination at TP09 be verified prior to excavation?

9. p. 2-10, Sediment; 2nd paragraph.

“Given the sensitive nature of the area along the northeast shoreline, and because a remedial action within the eelgrass bed would likely cause more harm to ecological aquatic species existing in that habitat, remedial action in this area should be considered only if absolutely necessary.”

Please see specific comment #3.

10. p. 3-41, Marine Sediment Alternatives, Alternative SD2.

Please update the description of SD2 to be consistent with the Executive Summary.

11. p. 4-1, Alternative SO4.

The revised title of Alternative SO4, "*Excavation of soils exceeding Industrial PRGs*", does not include soils exceeding Leachability Criteria, and is not consistent with the title of Section 4.1.4 on page 4-8. Please revise as necessary.

12. p. 4-17, Section 4.2.4, Alternative SO4 – Title

Please see previous comment.

13. p. 5-1, Section 5.0, Description and Detailed Analysis of Offshore Alternatives for Sediment.

Please see specific comment #3.

14. p. 5-4, Section 5.1.2, LUCs and Inspections; 1st paragraph, 1st sentence.

Please update the water depth for the Northeast Shoreline and delete "*will be established*" following the parentheses.