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U S NAVY RESPONSE TO REGULATOR COMMENTS ON DRAFT PROPOSED REMEDIAL  
ACTION PLAN SITE 17 BUILDING 32 AREA GOULD ISLAND WITH TRANSMITTAL NS  
NEWPORT RI  
2/10/2014  
TETRA TECH



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C-NAVY-02-14-5313W

February 10, 2014

Project Number 112G04295

Dr. Kenneth Finkelstein, PhD  
National Oceanic and Atmospheric Administration  
c/o USEPA Region I  
5 Post Office Square, OSRR-07-1  
Boston, Massachusetts 02114-3912

Reference: CLEAN Contract No. N62470-08-D-1001  
Contract Task Order No. WE76

Subject: Response to Comments, Draft Proposed Remedial Action Plan  
Comments Dated May 22, 2013  
IR Site 17 (OU6), Building 32 Area Gould Island  
Naval Station Newport, Jamestown, Rhode Island

Dear Dr. Finkelstein:

On behalf of Ms. Maritza Montegross, US Navy NAVFAC Mid-Atlantic, I am providing to you responses to your comments to the draft Proposed Remedial Action Plan (PRAP) for the Building 32 Area at Gould Island, which is located in Jamestown Rhode Island, and part of the Naval Station Newport, formerly the Naval Education and Training Center (IR Site 17 and OU6) at Newport Rhode Island. This package includes responses to your comments received by electronic mail on May 22, 2013.

Based on this response package, and based on the agreements made at the RPM meeting held January 15, 2013, it is our intention to move forward with the revised PRAP. If you have any questions, please do not hesitate to contact me at 978-474-8434.

Very truly yours,



James Forreli, PE  
Project Manager

Enclosures

c: D. Barclift, NAVFAC (w/encl.)  
P. Crump, RIDEM (w/encl.)  
G. Glenn, Tetra Tech (w/o encl.)  
K. Keckler, USEPA (w/encl.)  
L. McIntosh, Woodward & Curran (w/encl.)  
D. Moore, NAVSTA (w/encl.)  
M. Montegross, NAVFAC (w/encl.)  
K. Munney, USF&W (w/encl.)  
S. Parker, Tetra Tech, (w/encl.)  
P. Steinberg, Mabbett Associates (w/encl.)  
RDM Data Manager (Tetra Tech, (w/encl.)  
File 112G03685-8.0 (w/encl.), 3.1 (w/o encl.)

**NAVY RESPONSES TO COMMENTS FROM NOAA  
DRAFT PRAP  
SITE 17 – GOULD ISLAND  
NAVAL STATION NEWPORT, RHODE ISLAND  
COMMENTS DATED May 22, 2013**

The U.S. Navy (Navy) is pleased to provide the National Oceanic and Atmospheric Administration (NOAA) with responses to the May 22, 2013 comments on the Draft Proposed Remedial Action Plan (PRAP) for Site 17, Building 32 at Gould Island, which is part of Naval Station (NAVSTA) Newport in Newport, Rhode Island. Comments are presented first (*italics font*), followed by the Navy's responses.

Please note that additional revisions to the PRAP will be made to in accordance with revisions made to the FS in accordance with responses to comments from EPA dated December 17 and December 18, 2013. In addition, the Navy will eliminate the PDI for sediment at the Northeast Shoreline and replace that effort with monitoring that area in accordance with agreements reached at the RPM meeting held on January 15, 2014.

- 1. Are there three or four sediment remedies? Page 10 says four but only three are provided on page 11.*

Response: There are three possible remedies for sediment. A fourth remedy was eliminated as the Draft Final FS was being developed for submittal. This typo will be corrected

- 2. Although I support SED-3, I remain concerned about the potential impact to eel grass. If the sediment concentrations are above the PRGs in the eelgrass beds, then an injury has occurred there. The magnitude of the sediment chemistry above the PRGs should determine if the eelgrass should be disturbed. And that decision is not something that fits nicely into a Proposed Plan. But if the sediment supporting the eelgrass is above the PRGs then it is likely that the eelgrass provides an attractive nuisance to natural resources and some compensation for such injury should take place.*

Response: The comment is noted. With regards to the Proposed Plan and FS, after submittal of the redline Draft Final FS in August 2013, the project team agreed to conduct the sampling at the Northeast shoreline in the area of the eelgrass beds as a limited monitoring effort and not a Pre-Design Investigation step. No disturbance of the eelgrass beds is anticipated in the revised Alternative SD3 which will be described in the Final FS.

- 3. In mid-February Ken Munney and I spoke with Steve Parker concerning additional sampling in the eelgrass beds. We agreed that some more samples should be collected in the eelgrass area off the Northeast shoreline close to the higher concentrations found around 2005 to see if such still exists. Has this been collected and analyzed or will this be part of the PDI?*

Response: The additional sampling is anticipated to be conducted after the ROD, as a limited monitoring effort. Currently, two rounds of data collection are anticipated, consistent with the approach discussed with NOAA and USF&W. These are proposed to be conducted prior to, and following completion of the remedial action (RA) in the Stillwater Area. If one round is done in 2015, prior to the RA, and one is done just before the Five Year Review cycle (Five Year Review will be 2019), there will be a total of four sets of sediment data – 2005 (Phase 1 RI), 2009-2010 (Phase 2 RI), 2015 (Pre-RA), and 2018 (post RA). This is a proposed schedule and will be discussed with the team as the project progresses.

