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TRANSMITTAL LETTER REGARDING THE REVISED DRAFT FINAL FEASIBILITY STUDY
REPORT DECISION UNITS 1-1, 1-2 AND 1-3 SITE 7 TANK FARM 1 OPERABLE UNIT 13 (OU
13) NS NEWPORT RI
08/14/2015
RESOLUTION CONSULTANTS

August 14, 2015

U.S. Environmental Protection Agency, Region 1
Federal Facilities Superfund Section
Attn: Ms. Jane Dolan
5 Post Office Square, Suite 100
Mail Code: OSRR07-3
Boston, MA 02109-3912

Rhode Island, Department of Environmental Management
Office of Waste Management
Attn: Ms. Pamela Crump
235 Promenade Street
Providence, RI 02908-5767

RE: Revised Draft Final Feasibility Study (FS) Report
Decision Units 1-1, 1-2 and 1-3
Site 7 – Tank Farm 1, OU 13
Naval Station (NAVSTA) Newport, Rhode Island

Dear Ms. Dolan and Ms. Crump:

On behalf of the Naval Facilities Engineering Command (NAVFAC), Mid-Atlantic (MIDLANT), Resolution Consultants is pleased to provide this Revised Draft Final Feasibility Study (FS) Report for the Decision Units (DUs) 1-1, 1-2 and 1-3 at Site 7 – Tank Farm 1.

The Draft Final FS Report for DU 1-1, 1-2 and 1-3 was submitted to EPA and RIDEM on March 4, 2015 for concurrence per the FFA. EPA subsequently placed the document on-hold based on concerns with historic groundwater characterization at DU 1-1, as well as the rest of Tank Farm 1. A conference call was conducted on 7/2/15 among the Navy, EPA and RIDEM Tier I and II team. The outcome from that call included a team agreement to revise the DU 1-1, 1-2 and 1-3 FS to address only soil, deferring groundwater within Tank Farm 1 to a later date. Accordingly, the Navy has prepared this revised Draft Final FS document per the team agreement.

To facilitate review of changes that have been applied since the Draft Final version, the document is being provided as a “redline” version for the agencies’ review and concurrence. To maintain the FFA schedule expectations and the EMEC target for a signed ROD, agency concurrence is expected within 30 days, which is on or before September 13, 2015. A summary of significant changes applied since the Draft Final version is provided below:

1. Since the Draft Final FS was issued, the decision was made to define three separate decision units (DU 1-1, 1-2 and 1-3) for the Ethyl Blending Plant and Transformer Vaults 2 and 3. The FS was updated throughout to refer to these DUs where appropriate.

2. Since the Draft Final FS was issued, the decision was made to revise the FS so that DU 1-1 is defined as soil associated with the Ethyl Blending Plant (which includes the EBP and associated previously designated AOCs TF1-004, TF1-005, and TF1-018), DU 1-2 is defined as soil associated with Transformer Vault 2, and DU 1-3 is defined as soil associated with Transformer Vault 3. In other words, groundwater is now specifically excluded and deferred for a future team decision. Additionally, the following sentence was added to the first paragraph in the Executive Summary and Section 1.0:

"Groundwater was also sampled in the vicinity of the EBP as part of the DGA investigation and the analytical results indicated that no action was required for groundwater associated with releases from the EBP. However, the Navy is deferring a decision concerning sitewide groundwater until response actions are completed at the other (non-CERCLA) AOCs within the tank farm and a determination is made as to whether groundwater impacts associated with CERCLA releases have been addressed."

3. Based on the 7/2/15 conference call, the following paragraph has been added as the second paragraph in the Executive Summary and Section 1.0:

"RIDEM identified additional AOCs that were specifically listed on page 2 of the April 2012 dispute resolution agreement (inactive fuel loading area, former oil-water separator (central), former gasoline-water separator (west side), electrical structures, and sludge pits) as requiring additional Category 2 investigations. Also, consistent with the dispute resolution agreement, after investigations and/or response actions are completed for those AOCs, the Navy will evaluate the results from that work, and coordinate with EPA and RIDEM to assess whether actions are required to address remaining contamination in accordance with CERCLA or state regulations. If a CERCLA regulatory decision is required for those AOCs, a ROD amendment and/or separate ROD will be prepared."

4. The alternatives identified in the Draft Final FS Report have not changed, with the exception of minor revisions to cost and text description based on updated geophysical information, such as the observation that there is minimal soil/shallow bedrock in the vicinity of the Ethyl Blending Plant (EBP). The Revised Draft Final FS now clarifies that it is likely that little to no soil is present below the EBP foundation, but land use controls would be required for the remaining EBP foundation as a conservative measure to prevent access to soil, if it exists, below the building. For Alternative S-3, O&M and five-year review costs were added for an assumed duration of 10 years to provide a more realistic cost that reflects the short-term land use controls that are required for the EBP foundation under that alternative.

Please address your input to Cindy Castleberry, CTO Manager (781-224-6350), Mark Kauffman, Activity Coordinator (978-905-2262), and/or Jim Gravette, Navy RPM (757-341-2014). We look forward to working with you to finalize this document.

Sincerely,

A handwritten signature in blue ink that reads "Cindy Castleberry".

Cindy Castleberry, PE
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