

N62661.AR.002388  
NS NEWPORT  
5090.3a

LETTER REQUESTING SCHEDULE EXTENSION FOR SITE 8 NS NEWPORT RI  
02/14/2011  
TETRA TECH NUS



**TETRA TECH**

C-NAVY-02-11-4174W

February 14, 2011

Project Number 112G02124

Ms. Ginny Lombardo  
U.S. Environmental Protection Agency (EPA) Region I  
5 Post Office Square, Suite 100  
Mail Code OSRR07-3  
Boston MA, 02109-3912

Mr. Gary Jablonski  
Rhode Island Department of Environmental Management (RIDEM)  
235 Promenade St.  
Providence RI 02908-5767

Reference: CLEAN Contract No. N62470-08-D-1001  
Contract Task Order No. WE19

Subject: Schedule Extension Request  
Site 08, NUSC Disposal Area, Naval Station Newport, Newport RI

Dear Ms. Lombardo and Mr. Jablonski:

On behalf of Ms. Maritza Montegross, U.S. Navy NAVFAC, we are requesting a schedule extension for work at Site 08 in accordance with Section XV of the Naval Station Newport Federal Facility Agreement. The extension is requested in order to allow for additional time to address outstanding issues on both the draft Feasibility Study (FS) and the draft Supplemental Remedial Investigation (SRI) prior to issuing the revised FS.

EPA and RIDEM comments on the draft SRI, received January 20 and 24, 2011, respectively, directly affect the development of remedial alternatives in the FS. The identification of site chemicals of concern (COCs) and the development of preliminary remediation goals (PRGs) for Site 08 will affect the both the areas of attainment and the types of remedial technologies selected under each remedial alternative.

EPA comments also indicated that additional sampling is needed to provide evidence in support of remedial alternatives which incorporate monitored natural attenuation (MNA). Due to the presence of contamination within a fractured bedrock aquifer and the groundwater cleanup goals (e.g., drinking water standards), MNA is likely to be a necessary component of the cleanup strategy as a follow-up step to any active remedial efforts taken. Tetra Tech and the Navy agree that additional sampling of site geochemical parameters would benefit the MNA evaluation for the site at this time.

As discussed during the Remedial Project Manager (RPM) meeting on January 19, 2011, the project team has agreed to work toward signing a Record of Decision (ROD) for Site 08 by September 2012. To this end, Tetra Tech and the Navy are proposing a revised schedule (enclosed) which incorporates additional sampling for MNA parameters now and allows for more time to resolve comments on the SRI prior to issuing the revised FS. Note that some schedule items are fast-tracked in order to maintain the September 2012 ROD date.

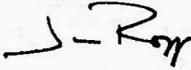
Given the limited temporal data at the site, the additional COC and MNA sample results would provide useful information regarding water quality and plume changes over time and would assist in the predication of a timeframe to remediation. We also believe that issues identified from the draft SRI need to be addressed and are preferably presented in the draft final SRI before issuing the revised FS. Incorporating additional MNA sampling results and an updated SRI into the FS will better position the FS

Ms. Lombardo, Mr. Jablonski  
February 14, 2011  
Page 2 of 2

to be accepted by the project team and will help reach concurrence on a site remedy. It is anticipated that this additional effort in 2011 will allow for acceleration of the Proposed Plan and ROD in 2012.

We look forward to discussing the proposed schedule at your earliest convenience. Please contact me at (978) 474-8449 or [jim.ropp@tetratech.com](mailto:jim.ropp@tetratech.com) should you have any questions.

Sincerely,



James Ropp, P.E.  
Project Manager

SSP

Encl. Proposed Schedule (1 hardcopy, email)

- c: M. Montegross, NAVFAC (w/ encl – 1 hardcopy, email)
- D. Moore, NAVSTA (w/ encl – 1 hardcopy, email)
- P. Golonka, Gannett Fleming (w/ encl. – email)
- K. Munney, USF&W (w/encl – 1 hardcopy, email)
- S. Parker Tetra Tech (w/encl. – email)
- D. Seiken, Tetra Tech (w/encl. – email)
- B. Mertz, Tetra Tech (w/ encl. – email)
- AR c/o G. Wagner, Tetra Tech (w/encl. – 1 hardcopy, email)
- G. Glenn, Tetra Tech (w/o encl.)
- File G02124-3.2 (w/ encl.)

**Proposed Schedule for Site 08, NUSC, Naval Station Newport  
2/14/2011**

	DURATION (days)	PROPOSED DATES		Notes
		START	END	
<b>ADDITIONAL MNA SAMPLING</b>				
Navy contracting for additional sampling	14	2/16/2011	3/2/2011	
Brief letter work plan (extension of previous work plan)	14	3/2/2011	3/16/2011	
Sample Collection	21	3/16/2011	4/6/2011	
Sample Analysis	21	4/6/2011	4/27/2011	
Data Validation & interpretation	21	4/27/2011	5/18/2011	
<i>Sampling Summary (tech memo or SRI/FS appendix)</i>	14	5/18/2011	6/1/2011	
<b>SUPPLEMENTAL RI</b>				
SRI RTC	45	1/24/2011	3/10/2011	
PREPARE DRAFT FINAL SRI	32	3/10/2011	4/11/2011	
<b>SUBMIT DRAFT FINAL SRI</b>	0	4/11/2011	4/11/2011	
REGULATORY REVIEW	30	4/11/2011	5/11/2011	
RTC + RESOLUTION	30	5/11/2011	6/10/2011	
PREPARE FINAL SRI	31	6/10/2011	7/11/2011	
<b>SUBMIT FINAL SRI</b>	0	7/11/2011	7/11/2011	
<b>FEASIBILITY STUDY</b>				
PREPARE REVISED DRAFT FS REPORT	14	6/1/2011	6/15/2011	issued after sampling summary
<b>SUBMIT REVISED DRAFT FS REPORT</b>	0	6/15/2011	6/15/2011	
REGULATORY REVIEW	30	6/15/2011	7/15/2011	
RTC	28	7/15/2011	8/12/2011	
PREPARE DRAFT FINAL FS REPORT	28	8/12/2011	9/9/2011	
<b>SUBMIT DRAFT FINAL FS REPORT</b>	0	9/9/2011	9/9/2011	
REGULATORY REVIEW	30	9/9/2011	10/9/2011	
RTC + RESOLUTION	30	10/9/2011	11/8/2011	
PREPARE FINAL FS REPORT	31	11/8/2011	12/9/2011	
<b>SUBMIT FINAL FS REPORT</b>	0	12/9/2011	12/9/2011	
<b>PROPOSED PLAN (PRAP)</b>				
PREPARE INTERNAL DRAFT PRAP	35	11/8/2011	12/13/2011	start linked to draft final FS resolution
<b>SUBMIT INTERNAL DRAFT PRAP</b>	0	12/13/2011	12/13/2011	
NAVY REVIEW	7	12/13/2011	12/20/2011	
PREPARE DRAFT PRAP	10	12/20/2011	12/30/2011	
<b>SUBMIT DRAFT PRAP</b>	0	12/30/2011	12/30/2011	
REGULATORY REVIEW	30	12/30/2011	1/29/2012	
RTC + PREPARE DRAFT FINAL PRAP	30	1/29/2012	2/28/2012	
<b>SUBMIT DRAFT FINAL PRAP</b>	0	2/28/2012	2/28/2012	
REGULATORY REVIEW	30	2/28/2012	3/29/2012	
RESOLUTION, PREPARE FINAL PRAP	29	3/29/2012	4/27/2012	
<b>SUBMIT FINAL PRAP</b>	0	4/27/2012	4/27/2012	
PUBLIC COMMENT PERIOD	30	4/27/2012	5/27/2012	
<b>RECORD OF DECISION (ROD)</b>				
PREPARE INTERNAL DRAFT ROD	35	2/28/2012	4/3/2012	start linked to draft final PRAP
<b>SUBMIT INTERNAL DRAFT ROD</b>	0	4/3/2012	4/3/2012	
NAVY REVIEW	10	4/3/2012	4/13/2012	
PREPARE DRAFT ROD	10	4/13/2012	4/23/2012	
<b>SUBMIT DRAFT ROD</b>	0	4/23/2012	4/23/2012	Responsiveness Summary not included
REGULATORY REVIEW	30	4/23/2012	5/23/2012	
RTC + PREPARE DRAFT FINAL ROD	30	5/23/2012	6/22/2012	
<b>SUBMIT DRAFT FINAL ROD</b>	0	6/22/2012	6/22/2012	includes Responsiveness Summary
REGULATORY REVIEW	30	6/22/2012	7/22/2012	
RESOLUTION, PREPARE FINAL ROD	30	7/22/2012	8/21/2012	
<b>SUBMIT FINAL ROD</b>	0	8/21/2012	8/21/2012	
Navy Signature	14	8/21/2012	9/4/2012	
<b>EPA Signature + RIDEM Concurrence Letter</b>	14	9/4/2012	9/18/2012	<b>TARGET SEPT 2012</b>
<b>LUC RD</b>				
PREPARE LUC RD	30	8/21/2012	9/20/2012	start linked to final ROD submittal
<b>SUBMIT INTERNAL DRAFT LUC RD</b>	0	9/20/2012	9/20/2012	
NAVY REVIEW	14	9/20/2012	10/4/2012	
PREPARE DRAFT LUC RD	14	10/4/2012	10/18/2012	
<b>SUBMIT DRAFT LUC RD</b>	0	10/18/2012	10/18/2012	
REGULATORY REVIEW	45	10/18/2012	12/2/2012	
RESPONSE, PREPARE DRAFT FINAL LUC RD	45	12/2/2012	1/16/2013	
<b>SUBMIT DRAFT FINAL LUC RD</b>	0	1/16/2013	1/16/2013	
REGULATORY REVIEW	30	1/16/2013	2/15/2013	
RESOLUTION, PREPARE FINAL LUC RD	30	2/15/2013	3/17/2013	
<b>SUBMIT FINAL LUC RD</b>	0	3/17/2013	3/17/2013	