



DEPARTMENT OF THE NAVY

NORTHERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
10 INDUSTRIAL HIGHWAY
MAIL STOP, #82
LESTER, PA 19113-2090

IN REPLY REFER TO
Code 182

20 NOV 1998

Warren S. Angell II
Rhode Island Department of Environmental Management
Office of Waste Management
235 Promenade Street
Providence, RI 02908-5767

Dear Mr. Angell:

We are in receipt of your letter dated November 12, 1998 that confirmed the unresolved technical issues from our November 10 meeting at Naval Station Newport, regarding the Surface Soil Sampling Work for the Old Fire Fighter Training Area. These issues were further discussed with Paul Kulpa from your office and Kymberlee Keckler from the United States Environmental Protection Agency Region 1 and James Shafer from the Northern Division. We understand RIDEM's requirement that surface soil samples be collected from the zero to two-foot interval. However, the United States Environmental Protection Agency (USEPA) requires that samples be taken from the zero to one foot interval while The Agency for Toxic Substance and Disease Registry (ATSDR) requests surface samples be collected from the zero to three inch interval. The Navy sampled the zero to one foot interval as this is consistent with past investigations conducted under the Installation Restoration Program at the Naval Station Newport and was acceptable to both the USEPA and ATSDR. In addition, we believe that exposure to soil 1 to 2 feet below the ground surface is not a complete pathway. The zero to one-foot sampling interval is a realistic, yet also conservative estimation of soil exposure. We fully appreciate your concerns regarding this issue but the Navy felt compelled to collect surface soil samples expeditiously as this information was requested to be collected in a timely manner during our November 3, 1998 briefing with Mr. Tom Gibson from the Senate Environment and Public Works Committee, Washington DC. In our opinion, the time needed to come to an agreement on a sample depth agreeable to all parties would not have allowed us to fulfill our commitment to Mr. Gibson.

The second issue regarded RIDEM's request to utilize "Furan" results as a screening tool to determine which samples are most likely to contain dioxins. Upon researching this issue, the Navy and USEPA have found no information, which indicates that Furan analysis, can be used to screen for dioxin. Tentatively identified compounds (TICs) which result from standard CLP analysis may provide some indication with regards to dioxin but have detection limits which may be orders of magnitude greater than the detection limits for the dioxin congeners that typically drive risk.

We recognize that after the issue of children safety is put to rest, additional work remains to be done at the Old Fire Fighting Training Area. We look forward to working with RIDEM and addressing your concerns as we work towards close out of this site.

Sincerely,

A handwritten signature in cursive script, appearing to read "A. Haring".

A. HARING
Director, Envir. Restor. Div.
By direction of the
Commanding Officer

Copy to:

Conrad Mayer, NORTHDIV

James Shafer, NORTHDIV

Terrence Gray, DEM

Paul Kulpa, DEM

Mary Sanderson, EPA

Kymerlee Keckler, EPA

Melissa Griffin, NAVSTA Newport

Carol Hossom, ATSDR