TETRA TECH NUS, INC.
55 Jonspin Road ▪ Wilmington, MA 01887-1020
(978) 658-7899 ▪ FAX (978) 658-7870 ▪ www.tetratech.com

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October 18, 1999

Project Number 5278

Mr. James Shafer
Remedial Project Manager
Northern Division, Naval Facilities Engineering Command
10 Industrial Highway, Mail Stop 82
Lester, Pennsylvania 19113

Reference: CLEAN Contract No. N62472-90-D-1298
Contract Task Order 0218

Subject: Meeting Summary: OFFTA Remedial Investigation Report Requirements
Naval Station Newport, Newport Rhode Island, October 5, 1999

Dear Mr. Shafer:

Enclosed for your review is the meeting summary for the meeting held on October 5, 1999 to discuss requirements for the OFFTA Remedial Investigation Report. The summary was prepared to describe the technical discussion and agreements made during the meeting.

Please contact me if you have any questions about this material.

Sincerely,

Diane M. Baxter

Diane McKenna Baxter
Project Manager

DM:rt

Enclosure

c: M. Griffin, NSN (w/enc.)
S. Behr, NSN (w/enc.)
D. Barclift, NorthDiv (w/enc.)
T. Bober, NorthDiv (w/enc.)
K. Keckler, EPA (w/enc.)
P. Kulpa, RIDEM (w/enc.)
R. Gottlieb, RIDEM (w/enc.)
J. Stump, Gannet Fleming (w/enc.)
P. Golunka/G. Sneed (w/enc) – c/o J. Stump
G. Glenn, TtNUS (w/enc.)
File 5278-3.2 (w/ enc.)

MEETING SUMMARY
OFFTA REMEDIAL INVESTIGATION REPORT REQUIREMENTS
OCTOBER 5, 1999, NAVAL STATION NEWPORT

Meeting Attendees:

Jim Shafer, U.S. Navy Northern Division RPM
Dave Barclift, U.S. Navy Northern Division
Todd Bober, U.S. Navy Northern Division
Melissa Griffin, Naval Station Newport
Shannon Behr, Naval Station Newport
Diane Baxter, Tetra Tech NUS, Inc.
Mark Jonnet, Tetra Tech NUS, Inc.
Kymberlee Keckler, U.S. EPA RPM
Peter Golunka, Gannet Fleming
Ginny Snead, Gannet Fleming
Paul Kulpa, Rhode Island Department of Environmental Management RPM
Rich Gottlieb, Rhode Island Department of Environmental Management

Meeting Convened at 8:10 a.m.

Jim Shafer gave a brief introduction summarizing the Navy's proposed schedule and general plan for completing the RI/FS process for the site. He emphasized that the Navy plans to clean up the site to residential standards. He noted that because the aquifer beneath the site is a GB aquifer, it would evaluated against GB water standards.

Diane Baxter and Mark Jonnet provided an overview of the existing data for the site, using GIS mapping as a visual aid for the discussion. Diane presented the Navy's conclusion that there is enough data to proceed with the RI for the site, with the following caveats: (1) additional information will be needed in the FS or pre-design stage to refine the estimates of the volume of soil requiring remediation, (2) a background study will be needed to develop reasonable cleanup goals for arsenic, and possibly other inorganics.

A discussion of RI data needs reached the following conclusions:

EPA has outstanding questions regarding the adequacy of the investigation of buried structures and pipelines across the site and within the central mound area. EPA also had questions about whether the screened intervals in the monitoring wells at the site are correctly placed to identify the presence of LNAPL.

EPA agreed that the RI could proceed without additional data collection provided that the Navy addresses these concerns in the RI report and during remediation.

The Navy agreed to the following to satisfy EPA's concerns:

1. The Navy agrees that it will remove any buried piping, debris, or other underground features encountered during remediation of the site.

2. The Navy agrees to excavate the central mound area and remove any potential contaminants sources in the mound during remediation of the site. The Navy has concluded that the central mound area will have to be excavated in order to access and remove the contaminated soils present beneath the mound. The Navy has also concluded that the only way to determine that the mound is free of potential contaminant sources is to excavate it, because geophysical techniques are not able to identify discrete buried objects within a mass of reinforced concrete and rubble, which is reportedly what comprises the mound.

3. The Navy will review the monitoring well construction logs to evaluate whether the screened intervals are adequately placed to evaluate the presence of LNAPL. The RI report will include this evaluation in an expanded discussion of the LNAPL investigation. The Navy has concluded that groundwater analytical results, which show only very low concentrations of organic compounds, do not indicate the presence of LNAPL.

RIDEM agreed that no additional sampling was needed to complete the RI.

A discussion of requirements for the background study reached the following conclusions:

1. Jim Shafer stated that the Navy believes a background study is needed for arsenic and other inorganics. He asked whether it would be possible to do a more limited study than RIDEM has required in the past.

   Rich and Paul stated that there is no flexibility in the State requirement for a minimum of 20 samples per soil type.

2. Rich mentioned that there a group at RIDEM is currently looking into the arsenic standard to determine whether it should be revised. He and Paul stated that the initial findings of the group were that the current standard appears to be reasonable.

   Rich agreed to check into the status of the arsenic standard.

3. There was a discussion of whether data from the Melville background study could be used for OFFTA.

   Paul agreed to check on whether the Melville data could be used.

   Diane agreed to check to determine whether the Melville soils were the same type as the OFFTA soils. <The review revealed that the soil types are not the same.>

4. There was a discussion of how a background study is conducted for sites such as OFFTA where the soil is disturbed fill. For example, for OFFTA, would background samples be taken from other locations on the island where the soil has the same classification?

   Paul agreed to check on how other disturbed sites have dealt with this issue.

A discussion of the HHRA led to the following conclusions:

1. Three additional exposure scenarios will be added to the existing scenarios presented in the Draft Final RI (TRC, 8/94) and the HHRA for Recreational Use of OFFTA/Katy Field (TtNUS, 5/99):
   1. Recreational Fisherman
   2. Subsistence Fisherman
   3. Residential

2. The residential scenario should evaluate the combined exposure to surface soil and subsurface soil down to the water table.

EPA stated that the data must be apportioned so that the numerous surface soil samples for the site are not weighted more heavily than the fewer subsurface soil samples.

The Navy agreed to propose an approach for apportioning the surface and subsurface soil data.

3. RIDEM stated that the residential scenario must also have a sediment component. EPA and the Navy disagreed, stating that the "shoreline visitor" exposure scenario evaluated for the Katy Field HHRA already assesses the risk from this exposure pathway. RIDEM disagreed, stating that a shoreline residential (not recreational) scenario is required because the frequency of exposure to shoreline sediment would be higher for residential use of the site than for the recreational scenario evaluated previously. RIDEM was asked how the sediment exposure should be included in the HHRA, for example should it be considered a separate exposure scenario from residential soils or should it be combined with soils; and if sediment is included, how should the exposure time be apportioned between soil and sediment (so that the total days of exposure does not exceed 365)?

   Paul agreed to look into the issue and get back to the group in one week with RIDEM's conclusion.

4. Shellfish Ingestion Rates – No agreement was reached on shellfish ingestion rates to use in the HHRA. Paul stated that the values previously requested by RIDEM (but not used) for the Derecktor Shipyard HHRA should be used. Paul did not know the values off-hand. Diane agreed to look into the issue to determine what values RIDEM had requested in the past. The Navy reserved comment on the use of the requested values.

   According to TtNUS records, the values RIDEM requested be used are as follows:
   Recreational fisherman (adult) – 15.6 g/day (equiv. to 36.5 meals/year, 150 g. meat/meal)
   Recreational fisherman (child) – 5 g/day (equiv. to 36.5 meals/year, 48 g. meat/meal)
   Subsistence fisherman (adult) – 80 g/day during peak months (6 months), average annual = 40 g/day (equiv. to 97.3 meals/year, 150 g. meat/meal)

   The values used by the Navy for the Derecktor Shipyard HHRA are as follows:
   Recreational fisherman (adult) – 1.2 g/day (equiv. to 2.9 meals/year, 150 g. meat/meal)
   Recreational fisherman (child) – 0.48 g/day (equiv. to 2.9 meals/year, 48 g. meat/meal)
   Subsistence fisherman (adult) – 15.6 g/day (equiv. to 36.5 meals/year, 150 g. meat/meal)

   A discussion of the derivation of these shellfish consumption rates is presented in Appendix E of the Marine Human Health Risk Assessment for Offshore Areas of the Former Robert E. Derecktor Shipyard (TtNUS, September 1998).

5. Because the aquifer beneath the site has is classified as a GB aquifer, the Navy concluded that a groundwater exposure scenario was not required. EPA agreed with this conclusion. RIDEM did not agree. Rich expressed concern that the groundwater could be used for showering, but suggested that a groundwater scenario may not be needed if the Navy agreed to institute a land use restriction prohibiting use of the groundwater. No conclusion was reached on this issue.

   Melissa agreed to look into whether the Base would agree to adopt a groundwater use restriction for the site.

6. During the discussion of site groundwater. Rich stated that RIDEM's groundwater degradation policy could require remediation of groundwater even if it did not exceed GB standards. However, he and Paul were not sure of the details of the policy.

   Paul agreed to look into the degradation policy and report back to the group.

7. Kymberlee stated that the skin surface area values used for calculating risks from dermal contact in the Katy Field HHRA were incorrect. EPA believes that the surface area should include the face and neck, instead of only the face, and that the surface area for the whole head should be used to approximate the face and neck. The HHRA used 50 percent of the surface area of the head. TtNUS and the Navy were not prepared to comment on this issue.

   It was agreed that a separate meeting is needed to discuss the exposure parameters to be used in the HHRA.