



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

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February 18, 2000

James Shafer, Remedial Project Manager
U.S. Department of the Navy
Northern Division
Naval Facilities Engineering Command
10 Industrial Highway
Code 1823-Mail Stop 82
Lester, PA 19113-2090

RE: Old Fire Fighter Training Area Ecological Risk Assessment, Naval Station Newport,
Newport, Rhode Island

Dear Mr. Shafer,

The Rhode Island Department of Environmental Management, Office of Waste Management, has reviewed the proposed alternate background sampling stations Work Plan, submitted by the Navy, for the Old Firefighter Training Area Ecological Risk Assessment. This Work Plan was submitted to address concerns with respect to the validity of the existing background sampling stations. As previously discussed, sampling of these proposed additional stations would involve the expenditure of limited funds and would delay the over all project. Furthermore, sampling of these additional stations may not affect the final conclusions drawn by the Ecological Risk Assessment. Accordingly, the State has proposed an alternate strategy that would used information from existing background sampling stations that have already been accepted by both the Navy and the regulators. This proposal was broached during the last Ecological Advisory Board Meeting.

The proposal is based upon a review of the physical and chemical data presented in the Ecological Risk Assessment. Biological data from the Ecological Assessment underwent a limited review as it relied upon a comparison to the existng contminated sampling stations that were in question. The State has compared site sampling data (both physical and chemical) to benchmarks, background sampling stations used at this and other sites, sampling data obtained from other sites, and remediation numbers generated at other sites. This comparison was performed in order to evaluate the site and access the need for additional background information.

Based upon this review it appears that certain sampling stations at the Old Fire Fighter Training

Area have been impacted from releases from the site. Specifically, sampling stations 1,2,3,4,5,6,7 & 12 have clearly been impacted from the site. The concentrations of petroleum related contaminants, PAHs, etc are high at these stations when compared to benchmarks, Long and Morgan values, etc. and to other stations, (other site stations or background stations). In addition, the sand content of these stations is high, (up to 98.5%) and the chemical absorbtive total organic carbon content of the sediments is low. This refutes any speculations with respect to excessive accumulation of background concentration of contaminants. Therefore, these stations have been clearly impacted and would have to be addressed in the remediation process.

Sampling stations # 9,10 & 15 do not appear to be impacted by the site. Stations 8 & 11 may have limited impacts but the observed concentrations do not appear to be significant. The remainder of the sampling stations may represent a release from the site (either direct or via down wind fallout), or a release another source, (i.e. sampling stations # 19 & 20 may have been located near a former Naval structure). It is clear, however, based upon a review of the physical and chemical data that the concentrations observed at these locations are not related to background. Finally, the concentration of contaminants at some of these locations may not warrant further action.

It is therefore recommended that the background sampling data from the Jamestown site be used in lieu of the existing stations. The Office is aware that the physical characteristics of these sampling stations grain size, etc. may not be ideal for some of the locations at the Old Fire Fighter Training Area. However, these stations were successfully used at the Derecktor Shipyards site. At this site the physical attributes of the sampling station were also not ideal.

It is also recommended that the Navy evaluate the data in a similar fashion as was done by the State. This evaluation will reveal that an additional background analysis will not affect the overall outcome of the project.

As previously stated, the Office's proposal is based upon, a review of the chemical and physical data from the site, as biological comparisons in the Ecological Risk Assessment was based upon comparisons to questionable data. The Office has conducted a limited comparison of biological data with the Jamestown sampling station. Based upon this limited review it appears that the biological data mirrors the chemical data. The Jamestown data should be used to confirm this initial finding.

Finally, the Office requests that the Navy evaluate whether cost savings can be realized by performing the remedial action at Old Fire Fighter Training Area concurrently with actions conducted at McAllister Point Landfill. Should such savings exist, the Office strongly recommends that the Navy conduct both actions concurrently. In order to allow this to come to fruition, the normal process, outlined in the FFA, could be avoided by considering this a removal action.

If the Navy has any questions concerning this matter please contact this Office at 410-222-2797 ext. 7111.

Sincerely,

A handwritten signature in cursive script that reads "Paul Kulpa".

Paul Kulpa, Project Manager
Office of Waste Management

cc: Warren S. Angell, DEM OWM
Robert Richardson, DEM OWR
Kymberlee Keckler, EPA Region I
Melissa Griffen, NETC

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