



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767 FDD 401-831-5508

December 18, 2001

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: Response to RIDEM Comment Regarding Limited PRGs for Marine Sediment Old Fire
Fighter Training Area, Naval Station Newport, Newport, Rhode Island

Dear Mr. Shafer,

The Rhode Island Department of Environmental Management, Office of Waste Management (RIDEM) has received the correspondences entitled Response to RIDEM Comment Regarding Limited PRGs for Marine Sediment Old Fire Fighter Training Area, dated 4 December 2001 and 6 December 2001. These correspondences were submitted to address a number of verbal and written comments submitted by the Office of Waste Management concerning the limiting steps in the PRG process. Specifically, the PRG process includes steps, such as collocation with other contaminants, biotoxicity screening, reference station screening, and SEM/AVS limiting metal bioavailability, which the Office of Waste Management had previously questioned. These concerns were reflected in the latest correspondence on this issue, included below, dated 30 October 2001.

1. General Comment.

Previously, the Navy agreed to submit preliminary remediation sediment values for all of the contaminants found at the site. These values would be derived independent of any mechanism in the preliminary remediation goal process, which is designed to limit the number of analytes. That is, the proposed remediation goal process would eliminate certain contaminants based upon a number of factors, such as collocation with other contaminants, screening via biotoxicity, etc. Please, as agreed submit the requested material.

The submitted December correspondence is limited to the collocation concern. It is assumed that the Navy will be submitting packages, which address the screening via biotoxicity, complete metal availability, and reference stations. In order not to delay the review of the PRG values the Office of Waste Management recommends that the Navy submit the additional packages at the same time. In addition, the package should include a PRG value calculated based upon the omission of all of the limiting steps, collocation, biotoxicity, metals availability, and reference station.

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If the Navy has any questions concerning the above please contact this Office at 401-222-2797, ext. 7111.

Sincerely,

A handwritten signature in black ink that reads "Paul Kulpa". The signature is written in a cursive style with a large, sweeping initial "P".

Paul Kulpa
Office of Waste Management

cc: Mathew DeStefano, DEM OWM
Richard Gottlieb, DEM OWM
Kymberlee Keckler, EPA Region I
Melissa Griffin, NSN

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