



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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June 17, 2002

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

Re: Summary of Discussions May 30, 2002 regarding Old Fire Fighting Training Area

Dear Mr. Shafer:

Thank you for the opportunity to review the May 30, 2002 meeting minutes. The following are technical comments on the *Summary of Discussions Old Fire Fighting Training Area - Dredging Options*, dated June 5, 2002.

The May 30, 2002 meeting was held for the remedial project managers to receive technical information to assist in the evaluation of the least environmentally damaging practical alternative. This objective is stated a bit differently in the meeting summary.

EPA requested a figure that displays stations where both human health and ecological PRGs are exceeded in the beach (intertidal) and nearshore areas. This request is not captured in the meeting summary.

Item number 2 of the meeting summary does not provide the intended clarification. Only one station within the eelgrass beds (410) exceeds PRGs. However, there is another station adjacent to the eelgrass bed (OFF-3) that exceeds PRGs that is recommended for possible action. The northern and western extent of the PRG exceedance at station 410 is not known.

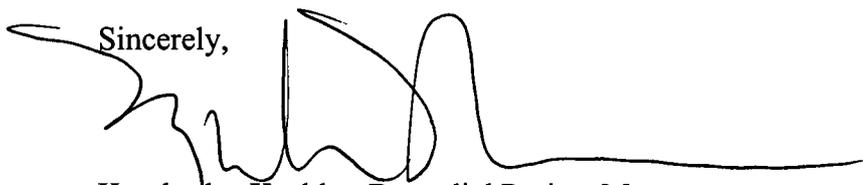
Several areas of uncertainty were identified and discussed at the meeting. The Navy planned to host internal discussions and get back to EPA and RIDEM with a recommendation. The cost of additional studies in light of the cost of the dredging remedies were also going to be evaluated. The five primary areas of uncertainty were:

- ▶ Source of the sediment contamination - Can it be differentiated whether the contamination is predominantly from past activities or if the contamination is on-going? Can the contribution from each be quantified?
- ▶ Ecological Risk Assessment - There was a proposal to reassess the risks using intertidal species

- ▶ Monitored Natural Recovery - Currently no one has any idea how long it will take for the sediments to reach PRGs via natural processes. Modeling and studies to estimate this time frame were discussed.
- ▶ Areal extent of sediments exceeding PRGs within the eelgrass beds.
- ▶ Sources of PAH contamination - relative contributions from burning activities, barbeque, and asphalt

I look forward to working with you and the Rhode Island Department of Environmental Management toward the cleanup of the Old Fire Fighter Training Area. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,



Kimberlee Keckler, Remedial Project Manager  
Federal/Facilities Superfund Section

cc: Paul Kulpa, RIDEM, Providence, RI  
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