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DEPARTMENT OF THE NAVY
ENGINEERING FIELD ACTIVITY, NORTHEAST
NAVAL FACILITIES ENGINEERING COMMAND
10 INDUSTRIAL HIGHWAY
MAIL STOP, #82
LESTER, PA 19113-2090

File: 4152-3.1
C: Parker

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IN REPLY REFER TO

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EV23/JS
December 12, 2002

Ms. Kymberlee Keckler
U.S. Environmental Protection Agency Region 1
1 Congress Street, Suite 1100 (HBT)
Boston, MA 02114-2023

Mr. Paul Kulpa
Department of Environmental Management
Division of Site Remediation
235 Promenade Street
Providence, RI 02908-5767

Dear Ms. Keckler and Mr. Kulpa,

**SUBJECT: PROPOSED PLAN FOR OLD FIRE FIGHTING TRAINING AREA
NAVSTA, NEWPORT, RI**

During our meeting of November 21, 2002 at Rhode Island Department of Environmental Management (RIDEM) several options were discussed for proceeding with the work for the Old Fire Fighting Training Area. These options were also summarized in USEPA email from Ms. Kymberlee Keckler dated November 25. The options include: 1) Formal Dispute Resolution if the Draft Final Proposed Plan does not change from the draft; 2) Revise the Proposed Plan to include dredging sediments and institutional controls for groundwater; 3) same as 2 above but in addition revising the Feasibility Study estimate for dredging sediments from \$3.9 million to USEPA estimate of \$1.7 million; 4) Pursuing a removal action for the on shore soils while additional data is collected for the sediments with a draft ROD approximately two years later than the planned date of May 2003; 5) prepare a contingency ROD where sediment data would be collected over a specified period of time and if decreasing trends of contaminant concentrations are not demonstrated dredging would be required. RIDEM mentioned that multiple options for the sediments can be included in a contingency ROD.

At the meeting the Navy discussed that it wanted to discuss the options in more detail with our staff. Once we were back in the office we assembled the Newport team and discussed all the options presented. The out come of our meeting was that the Navy prefers to continue with option 4, the removal action approach. This option was chosen because it would allow the on shore clean up work to proceed without any additional delays and also allows the parties to continue the discussion of what needs to be done with respect to the off shore sediment issues. The contingency ROD approach had too many unknowns

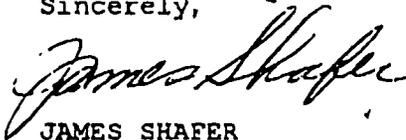
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at this time to be a workable solution. There are too many uncertainties with the sediments to be able to structure a very specific contingency option that all parties would agree to in a reasonable timeframe. The ROD itself would have to be a very large document since each option would need to be clear on what triggers the option. The Navy believes that we do not have enough sediment data to be able to clearly define the sediment contingency option. Therefore, the Navy believes that the best approach for this site is to proceed with the on shore soil removal action while data is collected for the sediments with a draft ROD at a later date.

As discussed at our meeting the Naval Research Lab is presently continuing their effort of collecting multiple rounds of sediment data for the site and that data will be share and used by us to better understand the actual conditions that are present at the site. As was discussed during our November 21 meeting and at several Restoration Advisory Board meetings, the Navy believes that new data collected subsequent to the draft Final Feasibility Study raises questions as to the source of contamination along the shore line of OFFTA, and sediment transport dynamics at Coasters Harbor Island. The Navy is concerned that dredging may not improve contaminant conditions over the long term.

We thank USEPA, RIDEM and NOAA for the productive meeting we had over this complicated issue and look forward to working with the Restoration Advisory Board on the Newport Installation Restoration Program.

Sincerely,



JAMES SHAFER
Remedial Project Manager
By direction of the
Commanding Officer

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OPTIONAL FORM 89 (7-90)

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