



RHODE ISLAND  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

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Al Haring, Installation Restoration Program 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 Proposed Plan, Naval Education and Training Center, Newport,  
Rhode Island

Dear Mr. Haring,

In a correspondence dated 12 December 2002 the United States Navy has proposed conducting an interim removal action for on site soils and monitoring of the offshore sediments at the Old Fire Fighter Training Area. Although the preferred alternative in the Proposed Plan is similar to this proposed removal action, we believe that a remedial action that removes both onshore and offshore sediments is the most appropriate and protective course of action.

Recently, the Navy has submitted the Feasibility Study and the Predesign Investigation Report. In regards to the Feasibility Study, one of RIDEMs main concerns was that the Navy appears to have overestimated the cost of dredging. In particular, it has not been substantiated that the dredging action at Old Fire Fighter Training Area is sufficiently similar to the McAllister Point Landfill project. Specifically, this site is not complicated by factors such as the presence of landfill debris, slope stability issues with respect to revetment failure, and potential logistics associated with re-opening of the cap. Taking into consideration these facts, it would appear unreasonable that the estimated dredging cost per cubic yard at Old Firefighter Training Area essentially equates to the dredging cost estimates produced in the Feasibility Study for McAllister Point Landfill. Furthermore, it is our understanding that the Navy is now producing an Explanation of Significant Difference for the McAllister Point Landfill site due in part to the fact that the cost of that dredging action was overestimated. The Office of Waste Management is aware that budgetary considerations may warrant the use of conservative estimates, however, the accuracy of these cost estimates is especially important when they are used at public meetings and in other formats as an argument against proceeding forward with this action at the Old Fire Fighter Training Area site.

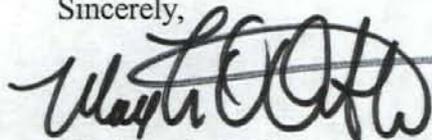
The current documentation has not clearly demonstrated that natural attenuation is occurring at the site. This is further evidenced by the lack of information regarding how long it will take for natural attenuation to occur. As is stated in the documentation, the dynamic nature of the environment adjacent to the site will make it difficult to monitor and observe trends. It seems apparent that these issues are unlikely to be resolved at the end of any monitoring program.

Finally, the Navy has stated that the offshore sediments may be removed after the remediation is completed on the on-shore portion of the site if data so warrants. As we have seen at the McAllister Point Landfill, the removal of the contaminated sediments adjacent to the site after completion of the on-shore remedial activities greatly complicated, and increased the cost of, the offshore dredging. Conversely, the offshore dredging action at the Melville North was facilitated and expedited by being performed concurrently with the on-shore removal action.

In conclusion, we feel that the data produced to date demonstrates that the highest concentrations of contaminants are found in the sediments immediately adjacent (off-shore) to the site and these contaminants represent an unacceptable human health and ecological risk. Furthermore, the contaminant concentration and distribution exceeds the contaminant levels formerly found at McAllister Point Landfill, which was actively remediated. While there may be disagreement between the agencies concerning the source of the contamination, the contamination must be dealt with appropriately and in a manner protective of human health and the environment. Accordingly, we strongly advocate that the removal of the offshore sediments should be conducted concurrently with remedial actions performed on the shore. The Office of Waste Management remains willing to work with the Navy in the active remediation of these off shore sediments, and hope we can move forward in that direction.

If you have any questions concerning the above, or would like to schedule a meeting to discuss these issues, please contact Richard Gottlieb or myself at 401-222-2797.

Sincerely,



Matthew D. DeStefano, Supervising Engineer  
Office of Waste Management

cc: Leo Hellested, Chief, DEM OWM  
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