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C-NAVY-07-04-1726W

July 9, 2004

Project Number N4152

Mr Curtis Frye
Remedial Project Manager
EFA Northeast, Naval Facilities Engineering Command
10 Industrial Highway, Mail Stop 82
Lester, Pennsylvania 19113

Reference: CLEAN Contract No. N62467-94-D-0888
Contract Task Order No. 0833

Subject: Transmittal of Pages 2-10 and 2-12
Draft Work Plan for Sediment and Groundwater Monitoring
Old Fire Fighting Training Area
Naval Station Newport, Newport, Rhode Island

Dear Mr. Frye.

As we discussed, enclosed are four copies of page 2-12 for the Draft Work Plan for Sediment and Groundwater Monitoring for the Old Fire Fighting Training Area that was distributed on June 30, 2004. This page was inadvertently omitted from the hard copy version, but is included in the electronic version.

Also, enclosed is a revised page 2-10 that should replace the one in the document Under Section 2.4.2 the bullet number 1 was revised for clarification to read as follows:

1) Are chemical concentrations in sediments after the first phase of soil removal actions higher or lower than those measured before the soil removal actions and are habitats degrading (point comparisons and comparisons of the means)?

I apologize for the inconvenience If you have any questions regarding these pages, please do not hesitate to contact Jim Forrelli.

Very truly yours,

James R. Forrelli /for

Stephen S. Parker, LSP
Project Manager

JRF/rp

Enclosures

c: K. Keckler, USEPA (w/encl. – 4)
P. Kulpa, RIDEM (w/encl – 4)
S. McFadden, TAG (w/encl. – 1)
C. Mueller, NAVSTA (w/encl. - 2)
J Stump, Gannett Fleming (w/encl. 2)
J. Trepanowski/G Glenn, TtNUS (w/ encl.)
File N4152-3.2 w/o encl., N4152-8 0 (w/encl.)

The monitoring program presented in this work plan will address the possibility of marine sediment and groundwater degradation from the soil removal actions. Changes in the sediment and eelgrass will be identified by comparing sediment monitoring data and extent of eelgrass mapped to previously measured data. The monitoring data will separate non-site related contaminant inputs to sediment, and will identify the extent of contamination contributed by these inputs. The monitoring effort will be conducted to measure concentrations of contaminants of concern (COCs) established in the RI and the FS reports for groundwater and sediment.

The process for these comparisons is described in Section 2.4.5 of this work plan.

2.4.2 Identification of the Decision

Under the monitoring program, four decision points will be met:

1) Are chemical concentrations in sediments after the first phase of soil removal actions higher or lower than those measured before the soil removal actions and are habitats degrading (point comparisons and comparisons of the means)?

2) Have chemical concentrations in groundwater changed since prior sampling events (point comparisons)?

3) Are the chemical concentrations in excess of the risk based Preliminary Remediation Goals (PRGs) set in the FS report (point comparisons)?

4) Do the chemicals (specifically PAHs) present at site originate from site related sources or from sources off-site such as stormwater and ambient bay inputs?

2.4.3 Inputs to the Decision

Inputs to the decision are the elements used in the decision process. Inputs to the decision as stated in Section 2.4.2 are as follows:

Sediment:

- COCs and PRGs established in the FS for sediment.
- Concentrations of COCs previously measured in sediment.
- Concentrations of COCs in sediments from background/reference locations.
- Possible source of COCs in sediment determined by forensic testing.

2.4.5.1 Decision Rule For Groundwater

If groundwater quality is found to be similar to that measured previously, this will be considered a baseline condition prior to soil removal actions. Degrading as a result of the soil removal action, re-evaluation of the protectiveness of the remedy described in the FS will need to be revisited. In later monitoring programs, the determination of whether degradation is occurring will be made through evaluation of future data compared to this baseline condition.

2.4.5.2 Decision Rule for Sediment

If sediment quality or ecological habitat is found to be degrading as a result of the soil removal action, some mitigation of the sediment may be required. The determination of sediment quality will be made through 1) evaluation of PAH and metals concentrations using processes described in Section 2.4.5.3 of this work plan and 2) evaluation of the sources of the contaminants found (forensic testing). The determination of degradation of the habitat will be made through continued evaluation of the health and extent of the eelgrass beds near the site, in concert with the COC and forensic evaluations.

If the decision rule for sediment is not met (i.e. sediment is degrading), the source of the degradation will need to be identified, and addressed, and if necessary, some sediment mitigation will need to be evaluated. If the marine ecological habitat appears to be degrading, the reason for that degradation will have to be sought. If there is a site specific source of degradation found through forensic testing or some other means, then that cause will have to be corrected in order to allow a natural restoration of the habitat.

2.4.5.3 Evaluation of Data

The tests for the decision rules will be conducted based on inputs described in Section 2.4.3. The inputs will be used as described in this section.

Chemical Data

Chemical data from groundwater and sediment data sets will be used separately to meet the first and second decision points provided in Section 2 4.2:

The analysis of the data sets will include descriptive statistics, graphic representations, and comparisons. Each monitoring data set will be compared against those taken previously. The groundwater data set will include 12 site wells and 3 upgradient wells; and the sediment data set will include 9 site stations, 1