



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

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BOSTON, MASSACHUSETTS 02114-2023

March 7, 2005

Curtis Frye
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: Draft Minutes from the Old Fire Fighting Training Area Excavation Constructability Review
Teleconference

Dear Mr. Frye:

EPA reviewed the draft minutes for the February 22, 2005 teleconference to discuss the soil excavation effort and the document entitled "OFFTA Excavation Constructability Review" for soil removal at the Old Fire Fighting Training Area, Naval Station Newport, Newport, Rhode Island. The focus of the discussion was on Alternative B-1. The draft minutes were received via e-mail dated February 25, 2005. Detailed comments are provided in Attachment A:

Throughout the minutes, phrases have been used such as "excavate to remove TPH" or "chase the TPH" and words to that effect. However, it should be noted that TPH is not the only driver for excavation. EPA repeatedly stated its concern about CERCLA contaminants such as PAHs. The rationale for the CERCLA action needs to be based on CERCLA contaminants. The removal of TPH is under RIDEM's program.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Kimberlee Keckler".

Kimberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: Paul Kulpa, RIDEM, Providence, RI
Cornelia Mueller, NETC, Newport, RI
Jennifer Stump, Gannet Fleming, Harrisburg, PA
Steven Parker, Tetra Tech-NUS, Wilmington, MA

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ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. 1	The time of the call was 9:30 a.m., not 10:25 a.m..
p. 1, last ¶	<p>The quote from the prior minutes is not consistent with the Navy's definition of the B-1 Alternative. The B-1 Alternative, as defined in the Navy's "Excavation Constructability Review," involves the removal of petroleum-related contaminants at concentrations greater than the PRGs to a depth of approximately three feet below the water table. In our discussions on February 22, 2005 Steve Parker verified that this definition for B-1 included PAHs after EPA indicated that a statement by Curt Frye erroneously limited excavation beneath the water table to TPH only. Based on our discussions on February 22, 2005 the agreement was to excavate into the water table as deep as possible without the use of sheet piles to remove petroleum-related contaminants at concentrations greater than the PRGs. If this is not done, Navy may find that upon completion, unrestricted use is not possible and additional actions may be required for closure.</p> <p>An agreement was not reached that the excavation of clean material will not be required. If temporary removal and stockpiling of clean material will facilitate the removal of soil with petroleum-related contamination at concentrations in excess of the PRGs at depths consistent with that for the B-1 Alternative, then EPA expects this to be done. For example, this could occur when clean material is temporarily excavated to provide access to contaminated soil at a deeper interval beneath the clean soil or it could occur when clean material is temporarily excavated to prevent sidewall collapse into an adjacent excavation from which contaminated soil is being removed.</p>
p. 2, ¶8	EPA indicated that the B-1 Alternative as presented in the "OFFTA Excavation Constructability Review" did not include the extra two feet of excavation even when that would have resulted in an excavation that was shallower than three feet below the water table. In other words, the water table elevation may have limited the excavation depth in some places <i>but not all places</i> . This may indicate that errors exist in the B-1 figure or possibly that averaging of depths resulted in the shallower excavation. However, the Navy should check this and correct it as part of the Work Plan.
p. 3, ¶8	EPA did not agree that Petroflag testing should be used to decide when to stop excavating as this paragraph suggests. Petroflag testing may be used as a <i>screening</i> tool to decide when to collect confirmatory samples in some instances. However, since PAHs are also contaminants of concern, another screening test will be required to indicate when confirmatory samples should be collected or laboratory analysis <i>in lieu</i> of screening may be used. Also, because of the unreliability of Petroflag screening, particularly for wet samples, a Petroflag threshold of 500 ppm is not recommended for decision-making.

The need for long-term monitoring will be determined by the conclusions of a risk assessment and confirmatory sample results - **not** based on Petroflag results less than 500 ppm as indicated in the minutes.

- p. 4, ¶3 EPA is concerned with CERCLA-related contaminants so the excavations should go as deep as possible without the use of sheet piles to remove petroleum-related COCs, such as PAHs, as well as TPH.

- p. 4, bullet 4 EPA did not agree that this would be the only excavation necessary. If contaminants and risk remain at the site (or if ARARs are not met), appropriate remedial action to address those risks will have to be determined via the CERCLA process. A Feasibility Study could include - but may not be limited to - LUCs, ICs, monitoring, GW treatment, and additional excavation as possible alternatives.

- p. 5, 2nd last ¶ Clarification is required regarding the statement that at least 2 feet would be removed out to the MLW line. The revetment drawing provided in the "Excavation Constructability Review" indicates that the revetment will be 4.6 feet thick and indicates that the top of the revetment will correspond with the top of existing grade. The statement in this paragraph does not appear to be consistent with the drawing. Does the Navy intend to change the ground surface elevation out to MLW? This should be clarified as part of the Work Plan.