UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
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March 23, 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: Technical Memorandum for Supplemental Soil Investigation - Additional Borings at the Old Fire Fighting Training Area

Dear Mr. Frye:

EPA reviewed the *Technical Memorandum for Supplemental Soil Investigation, Additional Borings*, Old Fire Fighting Training Area, Naval Station Newport, Newport, Rhode Island. EPA recommends that you modify the supplemental boring plan to better define areas of contamination at the site that need to be excavated below grade during the proposed removal action. EPA notes that Figure 4, dated February 9, 2005, which depicted the B-1 excavation plan showing grids requiring below grade excavation, omitted grids that will require below grade excavation. In particular, there is a large area along the northeastern shore that will require below grade excavation for TPH, including grids A-8 through A-10 and portions of grids B-8 through B-10. Although the averaging calculations provided previously in the Navy spreadsheet concluded that no excavation below the water table was required in these grids for the B-1 alternative, that conclusion is not realistic.

EPA has also noted that Figure 4 does not include below grade excavation in grid B-5 although there is significant PAH contamination there down to approximately three feet below the water table. As we discussed in our teleconference on March 16, 2005, some locations at the site should be excavated to remove significant PAH contamination. This is one of them. Grid A-7 has significant PAH contamination below the water table that also requires excavation.

It is unclear why the Navy proposes to excavate grid B-2 which has no TPH contamination and only marginal PAH contamination and suggests that resources planned for this grid be used for grid B-5 instead.

EPA offers the following recommendations regarding the locations for the supplemental borings:

a. Provide one additional boring 50 feet north of SB408 and another boring 50 feet south of SB408 to better define the extent of the PAH contamination detected at SB408, which will better define the initial excavation limits.

b. Add one boring immediately west of the 24-inch RCP drainage pipe in the eastern portion of grid A-7 approximately 40 feet south of SB428. This boring will define the western limits of the significant TPH and PAH contamination found in the prior explorations in grid A-8 (MW-102, TP-15, SB403, and SB429) and define the extent of the significant PAH contamination in SB428, which needs to be excavated to below the water table.

c. Move the proposed boring located between SB411 and SB412 to a point approximately 40 feet ENE of SB412. This boring will help define the southern extent of significant TPH contamination found at SB404, TP14, and TP16. The Navy's proposed boring location is in the immediate vicinity of boring B-15 which has apparently been omitted from the PDI report figures but is shown in the PDI work plan figure. B-15 had significant PAH contamination at approximately 2-3 feet below base grade and no analysis for TPH was performed for B-15.

d. The need for the proposed boring between SB424 and SB434 is not clear. This area apparently has very shallow bedrock based on the bedrock elevations found at B-17 and SB424 and there is no significant organic contamination at B-17 or SB424. EPA recommends that this boring be deleted and used for one of the other borings proposed above.

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

Sincerely,

Kymberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

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