



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

March 12, 2007

James Colter
Remedial Project Manager (Code OPNEEV)
Facilities Engineering Command, Mid-Atlantic
Naval Facilities Engineering Command
9742 Maryland Avenue
Norfolk, VA 23511-3095

3664

RE: Draft Fact Sheet Update Soil Clean Up at the Old Fire Fighter Training Area, Naval Station
Newport, Newport, Rhode Island

Dear Mr. Colter,

The Rhode Island Department of Environmental Management, Office of Waste Management has reviewed the Draft Fact Sheet Update Soil Clean Up at the Old Fire Fighter Training Area dated February 1, 2007. Attached are comments generated as a result of this review.

As the Navy is aware while the Office of Waste Management fully supports the removal of contaminated soil, and surface and subsurface structures at the site it is this Office's position that the current limited proposal will not meet cleanup objectives and that the Navy should take this opportunity to expand the remedial effort.

If the Navy has any questions concerning the above, please contact this Office at 401-222-2797, ext. 7111.

Sincerely,

A handwritten signature in cursive script that reads "Paul Kulpa".

Paul Kulpa
Office of Waste Management

cc: Matthew DeStefano, DEM OWM
Richard Gottlieb, DEM OWM
Kymberlee Keckler, EPA Region I
Cornelia Mueller, NSN

**Comments on Draft Fact Sheet Update
Soil Clean Up at the Old Fire Fighter Training Area**

**1. Excavate contaminated soil and debris.
Page 2.**

This section of the fact sheet notes that originally 58,000 tons of soil was to be removed from the site. The fact sheet does not include a figure for the estimated tonnage of soil that will be removed under the current proposal. As this is a public document, please include a statement in this paragraph with the estimated tonnage of soil that will be removed under the current proposal

**2. Why does the Navy Recommend this Plan
Page 2.**

There have been disagreements between the Navy and the regulators concerning the scale of the remedial action for the site and the associated risk. Therefore please remove the following from this box

“Meets risk reduction goals.”

“thereby insuring long term protection of human health and the environment”

**3. Site History
Page 3.**

Please add the following:

1989.....construction excavation at the Old Fire Fighter Training Area

Please note when the site was used as a day care facility, when the facility was closed, and when a new playground was proposed.

2001 There has been disagreements between the Navy and the State concerning shellfish ingestion rates, therefore please remove the statement 47 meals per year.

**4. What are the Cleanup Objectives
Page 5.**

As the fact sheet is designed for the public the Navy must include the proposed cleanup criteria for residential standards and the proposed restricted use. Therefore please modify the above as follows:

...or recreational purposes. The Navy initially proposed cleaning up the site to unrestricted recreational standards. As such the cleanup criteria for TPH would have been 500 ppm and the criteria for other contaminants, such as lead would have been 150 ppm.

...is restricted recreation and Navy personal use. The cleanup criteria under this scenario would be 30,000 ppm for TPH and there are no cleanup criteria for the other contaminants at the site.