



TETRA TECH

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Project Number 112G01477

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Reference: CLEAN Contract No. N62472-03-D-0057
Contract Task Order No. 132

Subject: Transmittal of Response to Comments
Site 09, Old Fire Fighting Training Area
Naval Station Newport, Newport RI

Dear Mr. Lim, Mr. Kulpa:

On behalf of Ms. Winoma Johnson, US Navy NAVFAC, I am providing you attached a final response to your conditional concurrence letter on the Draft Final FS Revision 1 for Site 09 (comments dated January 21, 2010. You will recall that these responses were issued to you in draft form on March 10, 2010, and were discussed during a conference call held 3/11/10. These final responses have been developed based on our discussions on and after March 11.

If you have any questions regarding this material, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Stephen S. Parker'.

Stephen S. Parker, LSP
Project Manager

SSP/

encl.

c: S. Bird, NAVFAC Mid-Atlantic (w/encl.)
K. Finkelstein, NOAA (w/encl.)
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W. Johnson, NAVFAC Mid-Atlantic (w/encl.)
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AR c/o G. Wagner, TtNUS (w/encl.)
File G01477-3.2 (w/o encl.) File G01477-8.0 (w/encl.)

**Final Response to EPA Comments on
Draft Final Revised Feasibility Study for
Old Fire Fighting Training Area
Naval Station Newport, Rhode Island
(December 2009)
Comments Dated 1/21/10**

Introduction:

On December 19, 2009 the Navy provided the Draft Final FS for the OFFTA site, Site 09, at NAVSTA Newport. On January 21, the USEPA provided a letter citing a conditional concurrence with the draft final, circumventing the need for a dispute of the draft final document. The conditions on the concurrence were described in 120 comments to the document.

In general, the Navy agrees with many of the conditions cited as indicated in the response to comments below. To expedite the delivery of a Final Revised FS submittal the Navy proposed to document the revisions through a technical memorandum and replacement pages, instead of issuing another complete version of the document. The technical memorandum will describe the major revisions to the FS, while the replacement pages will consist of new cover and signature sheets and other pages necessary for clarifications, or to correct errors or omissions in the draft final document. Together, the technical memorandum and replacement pages serve to update the draft final copies to the Final Revised OFFTA FS Report. The future Proposed Remedial Action Plan (PRAP) and Record of Decision (ROD) will reflect the major FS revisions as documented in the technical memorandum. During the Teleconference on March 11, it was agreed that this approach would be acceptable. This was reiterated at the RPM Meeting March 17, 2010.

The comments and responses that follow have been categorized into several parts, with a general response presented for each one. A table has been provided to cross reference which specific comment is generally discussed in each part. The parts that the comments were grouped into are listed below:

- Part 1 Comments Concerning the Waste Management Area
- Part 2 Comments Concerning Removal of the Sediment Alternatives
- Part 3 Comments Concerning Removal of Groundwater Alternative 3
- Part 4 Comments Concerning RCRA as an ARAR
- Part 5 Comments Concerning RIDEM GA/GB Criteria
- Part 6 Comments Concerning PAHs as CERCLA contaminants
- Part 7 Comments Concerning Minor issues the Navy Concurs with
- Part 8 Comments Concerning Clarification of Other Items

Specific comment responses for each of these categories are provided in each part except for the comments related to removal of the sediment alternatives and the removal of Groundwater Alternative 3. Specific comment responses for these are not required since the comments were generally very specific on how to change the document and the Navy is proposing to not make these changes in the FS but rather to document the change in the technical memorandum.

It is anticipated that change pages will be prepared for the comments in Parts 7 and 8 as well as for comments regarding deletion of the citation of state groundwater standards discussed in Part 5.

Part 1: Response to Comments Pertaining to the EPA Request to Establish a Waste Management Area at OFFTA.

The following is a response to comments that request changes that pertain to the request to establish a waste management area at the OFFTA site. This response addresses the comments numbered as follows in part, or in entirety: 1, 6, 10, 31, 34, 41, 45, 51, 53, 56, 67, 68, 72, 79, 80, 89, 108, 115, and 118. The specific comment responses are provided below the general response.

General Response:

The comments suggest establishing a waste management area (WMA) for the 8.6 acres of the site. This would provide a framework for future monitoring, and for establishing land use controls. The Navy is willing to concur with this approach with the understanding that it will be established under the Preamble to the NCP, which states: "remediation levels should generally be attained throughout the contaminated plume, or at and beyond the edge of the waste management area when waste is left in place".

By establishing this WMA, the Navy also concurs with the suggested approach for monitoring:

- The Navy concurs that groundwater does not require remediation under CERCLA within the waste management area or outside the WMA if the groundwater is saline.
- The Navy concurs that sediment monitoring will be required to assure no transport of contamination outside the WMA.

However the Navy believes that citation of the Safe Drinking Water Act as Action-Specific ARARs for monitoring purposes at the compliance boundary should not be required. At the teleconference March 11, 2010, it was clarified that OFFTA site WMA will extend to the shoreline, which is the downgradient edge of the site. Groundwater flow at OFFTA is toward the shoreline in all cases across the site so that at the WMA boundary the groundwater is saline and not potable. Therefore, it was agreed that the SDWA does not apply on the downgradient edge and MCLs do not have to be met in that area.

The EPA also stated that monitoring the upgradient edge of the WMA was necessary and comparison of that data to MCLs would be appropriate under SDWA. The Navy believes that monitoring can be conducted under goals stated in the ROD. The Navy does not feel it is appropriate to cite the Safe Drinking Water Act or the Manganese Health Advisory as an ARAR for any groundwater alternative because the groundwater in this area (down gradient of the WMA) is not potable. The Navy does not feel it is appropriate to cite the SDWA as an ARAR in upgradient wells because groundwater from the WMA does not flow in that direction.

The Navy agrees to conduct groundwater monitoring at the compliance boundary to assure groundwater quality is not degrading, and proposes that the data be compared to risk based goals (PRGs) for informational purposes to meet the objectives of assuring that contaminants are not being removed from the soil and being transported outside the WMA.

Comments addressed under Part 1 above:

Comment 1: *Page ES-3 – After 2nd bullet on sediment - add a new paragraph discussing delineation of a waste management unit for the 8.6 acre area. Include statement that groundwater under a waste management area or which is saline does not require remediation under CERCLA. Instead the federal groundwater ARARs and risk-based TBCs would be Action-specific for monitoring (to ensure groundwater outside the compliance zone meets federal drinking water standards).*

In addition, add another paragraph on sediment. Summarizing the fact that RAOs and alternatives were not developed for sediments because there is neither a Superfund human

health nor ecological risk to warrant a CERCLA action. Risks would also be mitigated by incidental removal of contaminated sediment during the installation of the revetment wall. Sediment would be monitored as part of soil and groundwater alternatives.

Response: The Navy agrees with the WMA approach. However, the Navy disagrees that federal groundwater ARARs and risk-based TBCs would be action-specific ARARs for monitoring because the groundwater outside the WMA is not potable. Text changes will be incorporated into the technical memorandum rather than making the change to the FS report.

Comment 6: *Page ES-5, Table ES-2 – Since the only contaminated groundwater is under a waste management area (wma) or is saline, then Alternative 2 meets the RAO when the source material is addressed. Groundwater under the wma never requires cleanup and only monitoring to ensure it does not migrate outside the compliance boundary for the wma. Assuming Soil Alternatives 2-4 would all leave contaminated soil in place under a clean cover that requires LUCs, then all the soil alternatives except 1 would create a wma.*

Response: The Navy agrees with this approach, however, the requested text changes will be incorporated into the technical memorandum rather than making the change to the FS report.

Comment 10: *Page 1-17, 4th Paragraph – The federal risk-based standard from an EPA Health Advisory is 0.3 mg/l, so note in the text whether manganese levels exceed the federal standard (is the RIDEM direct exposure criteria more or less protective. if less, remove the citation to the RIDEM standard).*

Response: Per EPA's Drinking Water Health Advisory, "A Drinking Water Health Advisory is not an enforceable standard for action. This Health Advisory describes nonregulatory concentrations of the contaminant in water that are expected to be without adverse effects on both health and aesthetics. Health Advisories serve as technical guidance to assist Federal, State, and local officials responsible for protecting public health when emergency spills or contamination situations occur. They are not to be construed as legally enforceable Federal standards." Therefore, the Navy does not believe that the advisory is an ARAR, but could be a TBC if the groundwater in question were potable. However, the Navy agrees that in this section, which discusses nature and extent of contamination, that the Manganese Health Advisory could be cited to provide a reader with a benchmark to help assess the relative magnitude of the manganese contamination. The applicability of the Manganese Health Advisory will be discussed in the technical memorandum.

Comment 31: *Page 2-4, 4th Paragraph – Unless there is a groundwater plume of contaminated groundwater that would extend beyond the compliance zone for the soil contamination being managed in place through the soil alternatives, there are no chemical-specific groundwater standards. Groundwater under a waste management area or which is saline does not require remediation under CERCLA. Instead the federal groundwater ARARs and risk-based TBCs would be Action-specific for monitoring (to ensure groundwater outside the compliance zone meets federal drinking water standards). RI drinking water standards are not ARARs and the RI remediation standards may be cited as action-specific monitoring standards if they are more stringent than federal standards.*

Response: The Navy agrees with the WMA approach, however, the Navy disagrees that federal drinking water standards and health advisories are action-specific ARARs for monitoring at OFFTA as discussed in the general response to Part 1 of this comment-response document. The WMA concept will be discussed in the technical memorandum, however, the FS report will not be revised for this comment.

Comment 34: *Page 2-7, Section 2.2.1, After 1st Full Paragraph – Add a sentence explaining the waste management area concept as area delineated under soil alternatives (area enclosed by*

bolded line in Figure 2-2). Include statement that groundwater underneath area does not have to meet PRGs.

Response: The Navy agrees with this approach, however, the requested text changes will be incorporated into the technical memorandum rather than making the change to the FS report.

Comment 41: *Page 2-21, 4th Paragraph – Note EPA comment concerning EPA’s risk-based standard for manganese.*

Response: Please refer to the response to Comment 10

Comment 45: *Page 2-28, 3^d Paragraph – Add an additional RAO “prevent migration of contaminated groundwater beyond the compliance boundary for any waste management area established to address soil contamination being managed on-site.”*

Response: The Navy agrees with this approach, however, the requested text changes will be incorporated into the technical memorandum rather than making the change to the FS report.

Comment 51: *Page 3-9, 1st Paragraph – Add at the of the last sentence “Capping also requires long-term monitoring, under the regulatory standards identified for the capped material, to ensure site contaminants are not migrating beyond the compliance boundary for the capped area.”*

Response: The Navy agrees with this approach, however, the requested text changes will be incorporated into the technical memorandum rather than making the change to the FS report.

Comment 53: *Page 3-10, 1st Paragraph - Add at the of the last sentence “A permeable cover also requires long-term monitoring, under the regulatory standards identified for the covered material, to ensure site contaminants are not migrating beyond the compliance boundary for the covered area.”*

Response: The Navy agrees with this approach, however, the requested text changes will be incorporated into the technical memorandum rather than making the change to the FS report.

Comment 56: *Page 3-32, Groundwater Monitoring paragraph – Add a new second sentence monitoring of groundwater outside of the compliance zone for the waste management area would ensure that federal drinking water standards are being maintained beyond the compliance zone boundary. Sediment monitoring will ensure contaminated groundwater does not pose a risk to human health or the environment in the intertidal or subtidal areas adjacent to the compliance zone boundary.”*

Response: Please refer to the general response to comments on Part 1 of this comment response letter. The Navy will explain its position concerning the applicability of the federal drinking water standards in the technical memorandum rather than making the change to the FS report.

Comment 67: *Page 5-1, Section 5.0 – If contaminated groundwater is only present under the area where contaminated soils are being managed in place under soil alternatives 2-4 (under a waste management area) or all of the contaminated groundwater is saline, then the only alternatives requires are No Action and Limited Action. Groundwater does not need to be remediated to meet federal drinking water standards under a waste management area or where it is saline. So remove all discussion of groundwater extraction and treatment (groundwater alternative 3) throughout the section.*

Response: The Navy agrees with this approach, however, the requested text changes will be incorporated into the technical memorandum rather than making the change to the FS report.

Comment 68: *Page 5-3, 1st Paragraph – Change the sentence to: “Groundwater and sediment monitoring would ensure that contaminated groundwater does not pose a risk beyond the compliance boundary for the waste management area.” In the third bullet add “and sediment” after “groundwater.”*

Response: The Navy agrees with this approach, however, the requested text changes will be incorporated into the technical memorandum rather than making the change to the FS report.

Comment 72: *Page 5-12, 6th Paragraph – Add at the end of the first sentence: “and ensure that contaminated groundwater is not posing a risk beyond the compliance boundary for the waste management area.”*

Response: The Navy agrees with this approach, however, the requested text changes will be incorporated into the technical memorandum rather than making the change to the FS report.

Comment 79: *Table 2-1, Page 1–2, Safe Drinking Water Act citations – Move to action-specific table since only used for monitoring (assuming all contaminated groundwater is within the compliance boundary for the waste management area). Change Status to Relevant and Appropriate. Change Consideration to “Standards used for monitoring groundwater beyond the compliance boundary for the waste management area. Groundwater beyond the waste management area will meet these federal drinking water standards (unless saline).”*

Response: As discussed in the general response to Part 1 of the comment/response letter, the Navy disagrees that the federal drinking water standard should be cited as action –specific ARARs because the water at the down gradient edge of the WMA is saline and nonpotable. The Navy does not believe that the Safe Drinking Water act is an ARAR for OFFTA.

Comment 80: *Table 2-1, Page 1, Clean Water Act, Section 304 – Move to action-specific ARARs table. Change Consideration to: “Standards used for monitoring sediment beyond the compliance boundary for the waste management area.”*

Response: The Navy agrees with this approach, however, the requested text changes will be incorporated into the ROD ARAR Tables and will be briefly discussed in the technical memorandum rather than making the change to the FS report.

Comment 89: *Table 2-3, Page 1 – Add the EPA Health Advisory for manganese as an action-specific standard for groundwater monitoring.*

Response: Please refer to the response to Comment 10

Comment 108: *Table 4-8 – Make changes already noted for Table 2-3. In particular federal Safe Drinking Water Standards and Health Advisory for Manganese cited as monitoring standards for waste left in place, as well as water quality regulations cited for monitoring sediments. Add CWA Pretreatment standards for discharges to a POTW. Also the full citations for the RI Hazardous Waste Regulations (specifically identify which pertain to ex situ treatment).*

Response: With regard to the Safe Drinking Water Act and the Manganese Health Advisory, please see the general response to comments in Part 1 of this comment response letter. The Navy agrees with the citation of the pretreatment standards for a discharge to a POTW with respect to a soil remediation that might generate contaminated water or wastewater and citation of the RI Hazardous Waste Regulations (which pertain to exsitu treatment), however, the requested text changes will be incorporated into the ROD ARAR tables rather than making the change to the FS report.

Comment 115: *Table 5-8 – make changes noted for table 2-3 regarding ARARs for monitoring (both safe drinking water act citations, federal health advisory for manganese, CWA and state*

water quality standards used for monitoring sediments. Also include federal and state hazardous waste standard for managing and disposing of contaminated soil the may be generated from well installation or O&M.

Response: With regard to the Safe Drinking Water Act and the Manganese Health Advisory, please see the general response to comments in Part 1 of this comment response letter. With regard to the other requested additions, the Navy agrees with this approach, however, the requested text changes will be incorporated into the ROD ARAR tables rather than making the change to the FS report.

Comment 118: *Table 5-12, Page 2 – Alternative 2, Time to Achieve RAO - change to “< 1 year once land use control and compliance boundary with monitoring established.”*

Response: The Navy agrees with this approach, however, the requested text changes will be discussed in the technical memorandum rather than making the change to the FS report.

Part 2: Response to Comments Requesting That Sediment Be Eliminated as a Media of Concern:

The following is a response to comments that request the document be revised to remove sediment as a media of concern for the site. This response addresses the comments numbered as follows in part, or in entirety: These include comments 1, 2, 4, 5, 7, 18, 19, 21, 22, 23, 24, 25, 26, 27, 28, 30, 32, 33, 35, 36, 37, 38, 40, 42, 43, 46, 48, 49, 50, 59, 60, 61, 62, 63, 64, 65, 66, 69, 71, 77, 78, 94, 95, 96, 97, 98, 100, 119, and 120). These comments are provided below the response.

General Response:

The Navy agrees with the EPA that the sediment alternatives could be eliminated from the FS because of the levels and uncertainties of the risks estimated. Consistent with Navy's proposal for expediting the final FS document submittal, the Navy will document this change in the technical memorandum; the affected portions of the FS document including Section 6 will not be changed. Elimination the sediment alternatives will be reflected in the future PRAP and ROD.

As discussed in the introductory paragraphs to this comment response letter, specific comment responses were not prepared for comments in this section since the comments were generally very specific on how to change the document and the Navy is proposing to not make these changes in the FS but rather to document the change in the technical memorandum.

Comments addressed under Part 2 above:

Comment 1: *Page ES-3 – After 2nd bullet on sediment - add a new paragraph discussing delineation of a waste management unit for the 8.6 acre area. Include statement that groundwater under a waste management area or which is saline does not require remediation under CERCLA. Instead the federal groundwater ARARs and risk-based TBCs would be Action-specific for monitoring (to ensure groundwater outside the compliance zone meets federal drinking water standards).*

In addition, add another paragraph on sediment. Summarizing the fact that RAOs and alternatives were not developed for sediments because there is neither a Superfund human health nor ecological risk to warrant a CERCLA action. Risks would also be mitigated by incidental removal of contaminated sediment during the installation of the revetment wall. Sediment would be monitored as part of soil and groundwater alternatives.

Comment 2: *Page ES-3, 1st Paragraph – Delete “sediment” from list.*

Comment 4: *Page ES-3 - Delete paragraph and numbered bullets for sediments at bottom of page.*

Comment 5: *Page ES-4, 1st Paragraph – Change Table ES-3 to ES-2 to account for deletion of sediment alternatives. Delete “sediment” from list.*

Comment 7: *Page ES-6, Table ES-3 – Delete table.*

Comment 18: *Page 1-27, 2nd Paragraph (Comment 15) – Based on this discussion of shoreline sediment risk, there is no federal risk from exposure to sediment identified, so no basis for including a sediment remedy for the intertidal area in the FS. If this is so, revise the document to remove all discussion of a CERCLA sediment remedy.*

Comment 19: *Page 1-28, 2nd Paragraph – Insert sentence(s) from Section 6.0 first paragraph that report*

Comment 21: Page 1-30, Section 1.10.4 – Add a new section and entitle “Sediment Risk Evaluation.” Move text from Section 2.3.3.2 and 2.3.3.3 since these paragraphs support no CERCLA actionable human health risk in sediment. Add text from 1st and 3rd Bullet from Section 2.4 on page 2-26 to this section.

Comment 22: Page 1-30, Section 1.10.4 – Change to “Section 1.10.5

Comment 23: Page 1-30, Section 1.10.4, 2nd Paragraph – Delete “and intertidal sediment.”

Comment 24: Page 1-31, 1st and Last Paragraphs – Delete since sediments determined not to pose a human health risk in prior new section.

Comment 25: Page 1-32, 1st Five Bullets – Remove since there is no federal risk identified from sediments (see comment 17).

Comment 26: Page 1-32 – Remove the shellfish contaminant list since there are no shellfish risks identified from Site CERCLA contaminants.

Comment 27: Page 1-33 – Before last paragraph, paste 1st full paragraph from Section 2.3.3.1 page 2-23 here to provide explanation for no ecological risk to warrant action.

Comment 28: Page 1-34 – Delete subsection on “Selection of Chemicals of Concern.”

Comment 30: Page 2-4, 2nd and 3rd Paragraphs – Since no federal CERCLA risk from sediments or shellfish was identified there are no sediment or shellfish ARARs, so remove the two paragraphs.

Comment 32: Page 2-6, 2nd Paragraph (after bullets) – Delete “sediment” and “shellfish”

Comment 33: Page 2-7, Before 1st Full Paragraph – Add a sentence referring back to new Section 1.10.4 which presents explanation for no CERCLA actionable risk from sediments or shellfish.

Comment 35: Page 2-8, Sediment Paragraphs – Delete because prior section explains why sediment or shellfish is not carried further.

Comment 36: Page 2-10, 2nd Paragraph – There are no PRGs for sediment because there is no CERCLA risk from sediment.

Comment 37: Page 2-11 to 13 – Delete paragraphs on Sediment PRGs for both Intertidal Exposure and Shellfish Consumption.

Comment 38: Page 2-14, Section 2.2.3 – Delete this section.

Comment 40: Page 2-19, Section 2.3 – Delete “sediment”

Comment 42: Page 2-22, Section 2.3.3 – Remove the entire section since there are no CERCLA human health or ecological risks from sediments or ingestion of shellfish.

Comment 43: Page 2-26, Section 2.4 – Move text from 1st and 3rd bullets to new section 1.10.4 as discussed in comment above.

Comment 46: Page 2-28, Section 2.4.3 – Remove the section since no CERCLA risks from sediment.

Comment 48: Page 2-31, Section 2.5.3 – Remove this section since there are no CERCLA risks from sediments.

Comment 49: Page 3-1, Last Paragraph – There should be no General Response Actions for sediments.

Comment 50: Page 3-3, 1st Paragraph – Remove the third sentence which discusses sediment.

Comment 59: Page 3-50, Section 3.4 – Remove the entire section (pages 3-50 to 3-68) since there are no CERCLA risk from intertidal sediment and subtidal sediments are contaminated with non-CERCLA site contaminants.

Comment 60: Page 4-5, 12th Bullet – Insert “and sediment” after “groundwater.”

Comment 61: Page 4-6, 9th Bullet – Insert “and sediment” after “groundwater.”

Comment 62: Page 4-7, 5th Bullet – Insert “and sediment” after “groundwater.”

Comment 63: Page 4-17, 3rd Paragraph – In the last sentence insert “and sediment” after “groundwater.”

Comment 64: Page 4-17, Last Paragraph – In the last sentence change “may” to “will” and “Sections 5 and 6” to “Section 5.”

Comment 65: Page 4-21, 3rd Paragraph – In the last sentence change “may” to “will” and “Sections 5 and 6” to “Section 5.”

Comment 66: Page 4-24, 4th Paragraph – In the last sentence change “may” to “will” and “Sections 5 and 6” to “Section 5.”

Comment 69: Page 5-3, 3rd Paragraph – Also discuss sediment monitoring that will be required to ensure waste left in place in soil/groundwater does not migrate from the waste management area and create a risk in sediment.

Comment 71: Page 5-11, 1st Paragraph – In the third sentence, the cost of sediment monitoring also needs to be included.

Comment 77: Page 6-1, Chapter 6 – Remove the entire chapter because there are no CERCLA sediment risks at OFFTA.

Comment 78: Table 1-2 – Add a footnote for the Lobster, Clam and Blue Mussels the contamination is from non-CERCLA site sources. In the alternative remove the three categories.

Comment 94: Tables 2-6 & 2-7 – Remove tables because no risk from sediment or shellfish therefore there are no PRGs for either.

Comment 95: Table 2-9 – Remove sediment PRGs.

Comment 96: Table 2-10 – Remove the table since there are no ecological risks from CERCLA-site contaminants in the sediment, therefore no PRGs.

Comment 97: Tables 2-14 thru 2-16 – Remove all sediment PRGs, however sediment PRGs should be used in sediment monitoring program.

Comment 98: Table 2-19 – Remove since all exceedances for shellfish and ecological risk from non-CERCLA contaminants.

Comment 100: Tables 3-5 & 3-6 – Remove since no CERCLA sediment risk.

Comment 119: Table 5-12, Page 3 – Alternative 2, Ability to Monitor Effectiveness... and Administrative Requirements - insert "/sediment" after "groundwater."

Comment 120: Table 6-1 to 6-12 – Remove all tables since there is no CERCLA sediment risk.

Part 3: Eliminate Groundwater Alternative 3 – Treatment

The following is a response to comments that request the document be revised to remove groundwater alternative 3 – treatment from the document. This response addresses the comments numbered as follows in part, or in entirety: These include comments 3, 52, 54, 55, 56, 57, 58, 67, 70, 75, 76, 99, 111, 112, 116, and 117).

Response:

The Navy agrees with the EPA that the groundwater treatment alternative could be eliminated from the FS. Consistent with Navy's proposal for expediting the final FS document submittal the Navy will document this change in the technical memorandum; the affected portions of the FS document will not be changed. The elimination of this alternative will be reflected in the discussion on the selection of an appropriate groundwater remedial alternative as part of the PRAP and ROD. In addition, the Navy concurs that monitoring is needed to ensure site contaminants are not migrating beyond the compliance boundary for the waste management area (comments 52, 54, 56, 67), however, they Navy does not agree that the federal drinking water standard are appropriate to for monitoring at the compliance boundary because the groundwater is not potable at this location (see the general response to comments in Part 1 of this comment response letter).

As discussed in the introductory paragraphs to this comment response letter, specific comment responses were not prepared for comments in this section since the comments were generally very specific on how to change the document and the Navy is proposing to not make these changes in the FS but rather to document the change in the technical memorandum.

Comments addressed under Part 3 above:

Comment 3: Page ES-3, 3rd Paragraph – Delete #3 groundwater alternative.

Comment 52: Page 3-9, 1st Bullet – Add at the end of the last sentence “and long-term monitoring.”

Comment 54: Page 3-10, 1st Bullet – Add at the end of the third sentence “and long-term monitoring.”

Comment 55: Page 3-30, Section 3.3 – Note in the text that no remedial action other than institutional controls and monitoring are required if all contaminated groundwater is limited to the area of the soil contamination that is being managed in place (under all of the soil alternatives soil exceeding residential risk levels, requiring permanent LUCs) or if all of the contaminated groundwater on-site is saline. No containment or treatment alternatives are warranted.

Comment 56: Page 3-32, Groundwater Monitoring paragraph – Add a new second sentence monitoring of groundwater outside of the compliance zone for the waste management area would ensure that federal drinking water standards are being maintained beyond the compliance zone boundary. Sediment monitoring will ensure contaminated groundwater does not pose a risk to human health or the environment in the intertidal or subtidal areas adjacent to the compliance zone boundary.”

Comment 57: Page 3-33 – Unless groundwater contamination extends beyond the compliance boundary for the waste management area remove subsections 3.3.2.3, 3.3.2.4, 3.3.2.5, and

3.3.2.6. The Site should be treated like the McAllister landfill, where there are no containment or treatment requirements for the contaminated groundwater that remains under the waste management area.

Comment 58: Page 3-49, Section 3.5.3 – As previously state only no action and limited actions alternatives are required if contaminated groundwater only occurs within the compliance boundary of the waste management area or the groundwater is saline.

Comment 67: Page 5-1, Section 5.0 – If contaminated groundwater is only present under the area where contaminated soils are being managed in place under soil alternatives 2-4 (under a waste management area) or all of the contaminated groundwater is saline, then the only alternatives requires are No Action and Limited Action. Groundwater does not need to be remediated to meet federal drinking water standards under a waste management area or where it is saline. So remove all discussion of groundwater extraction and treatment (groundwater alternative 3) throughout the section.

Comment 70: Page 5-3, Section 5.2.3 – As previously noted remove this alternative unless contaminated groundwater occurs outside of the compliance boundary for the waste management area or is not saline.

Comment 75: Page 5-15, Section 5.5.3 – Remove if contaminated groundwater is solely under the waste management area or is saline.

Comment 76: Page 5-20, Section 5.6 – Remove any comparison of Alternative 3 if contaminated groundwater is solely under the waste management area or is saline.

Comment 99: Tables 3-3 & 3-4 – Remove Containment, Removal, Treatment, and Disposal GRA since not required if all groundwater is under a waste management area or is saline.

Comment 111: Table 5-1 – For alternative 2, third bullet add “and sediment” after “groundwater;” remove Alternative 3 unless contaminated groundwater extends outside of the compliance boundary for the waste management area and is not saline.

Comment 112: Table 5-2, Page 1 – Remove Alternative 3; for Alternative 2 change “Are Environmental Risks Reduced...” change text to “No environmental risks from groundwater;” for chemical-specific ARARs remove the footnote (MCLs are action-specific ARARs for monitoring); time RAOs achieved change to “< 1 year once land use control and compliance boundary with monitoring established.”

Comment 116: Tables 5-9 thru 5-11 – Remove if contaminated groundwater only within the compliance boundary of the waste management area or is saline.

Comment 117: Table 5-12, Page 1 – Remove alternative 3 if contaminated groundwater only within the compliance boundary of the waste management area or is saline; for Alternative 2, chemical-specific ARARs –change second sentence to: “Only required to meet chemical-specific standards outside of the compliance boundary for the waste management area;” action-specific ARARS – change text to: “federal drinking water and risk-based groundwater standards, along with sediment monitoring standards, used to ensure contaminated groundwater does not migrate beyond the compliance zone to pose a risk;” Need for Long-Term Management – add “sediment” after “groundwater.”

Part 4: Response to comments adding RCRA as an ARAR

The following is a response to comments that request the document be revised to utilize RCRA to provide the regulatory basis for cover and monitoring systems. This response addresses the comments numbered 87 and 90 in part, or in entirety.

General Response:

Comment 87 states that "The Navy has identified that it expects a certain volume of soil on-site to exceed toxicity standards." This statement is not accurate. While there is language in the FS providing an allowance in the cost estimate for disposal of RCRA waste, if soil excavated under alternative 3 is found to exceed RCRA standards, this is not an assertion that Navy believes soil will indeed exceed standards. It appears that EPA has made a collective assumption that concludes that soils are present at the site that could exceed TCLP standards if they were subjected to the TCLP test. The Navy's provision for allowance of costs for potential disposal of RCRA waste should not be read as an actual expectation that some volume of soils would exceed toxicity levels., The Navy maintains that the groundwater data available does not indicate a leaching problem under the in-situ conditions.

Comment 87 goes further to suggest that soil exceeding toxicity thresholds is not hazardous waste but triggers RCRA as relevant and appropriate for cover standards, for monitoring requirements, for establishment of waste compliance zones, and for establishment of land use restrictions. It would seem that this interpretation would make RCRA relevant and appropriate for any soil alternative where contaminants are left in place. Navy does not believe this to be true.

At the teleconference held March 11, 2010, the EPA stated that any action taken at the site must be "tied to an ARAR," and that as such, RCRA was the closest standard to the conditions at OFFTA if a waste management unit is established.

The Navy disagrees that RCRA should be cited as relevant and appropriate.

In order to be an ARAR, a requirement (if not "applicable") must be both relevant AND appropriate. The RCRA landfill cover standard is not relevant or appropriate simply because it is the only cover standard that could be identified. It is the Navy's position that the RCRA landfill cover requirements are neither relevant nor appropriate to a non-landfill contaminated soil in situ situation. The RCRA standards do not deal with issues sufficiently similar to the situation at our site, and they are not well-suited to this situation. RCRA cover standards are intended to prevent intrusion and contact of water with the waste, thus eliminating leachate generation and migration. A soil cover is only provided to prevent receptors from interaction with the contaminated soil during everyday use of the property. The soil cover is more like a fence in that it provides a barrier from inadvertent access into an area. Thus RCRA is not relevant because it serves a different purpose from the soil cover. Nor is it appropriate because it isn't needed to prevent water intrusion or leachate management. Only by its physical appearance and manner in which it is constructed does the soil cover appear similar to the RCRA cap.

Additionally, the Navy disagrees that all actions taken at the site must be "tied to an ARAR." EPA's own publications have noted that situations will arise when there are no "applicable" or "relevant and appropriate" requirements for a particular situation. As noted in OSWER 9205.5-10A, Applicable or Relevant and Appropriate Requirements, paragraph 2.1 (Role And Definition of Applicable and Relevant And Appropriate Requirements):

"ARARs are used in conjunction with risk-based goals to govern Superfund response activities and to establish cleanup goals. EPA uses ARARs as the starting point for determining protectiveness. *When ARARs are absent* or are not sufficiently protective, EPA uses data collected from baseline risk assessment to determine cleanup levels. ARARs thus lend structure to the Superfund planning process, but do not supplant EPA's responsibility to reduce the risk posed by a Superfund Site to an acceptable level." (emphasis added)

Therefore, the Navy retains its position to include land use controls as a part of the final remedy for this site that include appropriately protective enforcement, inspection and reporting requirements in accordance with the DOD Land Use Control Principles dated January 16, 2004 and agreed to by both DoD and EPA.

Finally, comment 87 states that if soil is excavated that is determined to be hazardous; RCRA is applicable for disposal. The Navy concurs with this statement, and agrees that the Navy would be subject to generator standards in that situation.

Comments addressed under Part 4 above:

Comment 87: *Table 2-3, Page 1, Resource Conservation and Recovery Act – Cite as Relevant and Appropriate for any contamination exceeding toxicity thresholds left in place and applicable for any contaminants exceeding toxicity thresholds. Delegated to the State of Rhode Island so specific provisions reference under the RI Hazardous Waste Regulations. Full citation previously provided by EPA. The Navy has identified that it expects a certain volume of soil on-site to exceed toxicity standards. Therefore, although contaminated soil left in place exceeding the standards is not hazardous waste, these standards are the closest relevant and appropriate regulations to cite regarding cover standards (to address soil contact risks), monitoring requirements, establishment of a waste management areas and its accompanying groundwater compliance zone, and land use restrictions. Standards applicable for the management and disposal of any media generated at part of the remedial action that exceeds toxicity standards.*

Response: As discussed above in the Part 4 General Response, the Navy does not feel that RCRA is relevant and appropriate for OFFTA with respect for material left on site.

Comment 90: *Table 2-3, Page 1 – In addition to citing the RI Hazardous Waste Management Act cite the rules and Regulations for Hazardous Waste Management (citation information previously provided by EPA). In particular, Rule 5 (Generator standards), Rule 7 (Treatment, Storage, and Disposal Facilities, Rule 8 (General Facility requirements) should be specifically included.*

Response: As discussed above the Navy does not feel that RCRA is relevant and appropriate for OFFTA with respect for material left on site. The RI hazardous waste management regulations cite RCRA therefore the Navy does not feel that the RI Hazardous Waste Management Act is relevant and applicable to materials left on site at OFFTA.

Part 5: Response to comments requesting deletion or modification to references to State GA/GB criteria

The following is a response to comments that request the document be revised to eliminate the discussion and citation of GA and GB criteria or to change the citation of the GA and GB criteria. This response addresses the comments numbered 9, 12, 15, 20, 29, and 44, in part, or in entirety.

General Response:

The Navy would prefer to leave the references within the document, primarily because these criteria, while they may not be enforceable under a CERCLA action, are enforced under other state law (comments 9, 12, 15, and 20). Rather than delete them altogether, the Navy proposes to cite MCLs as the appropriate criteria, and then provide the GA or GB standard in parentheses. For example: "Lead, detected at elevated concentration of 38.6 µg/l exceeded the MCL (and RIDEM GA objective, but well within the RIDEM GB criteria) that is applicable to the site." These changes will be made in the FS and will be issues as change pages. Note that while they Navy agrees that federal drinking water standards can be cited as a benchmark to allow the reader to assess the level of contamination at OFFTA, the Navy does not believe that federal drinking water standards are ARARs for monitoring as discussed in general response to comments in Part 1 of this comment response letter.

Comments 29, and 44 indicate that the selection of state soil remediation standards should be based on drinking water standards being under the site (since this is consistent with federal drinking water standards), and not GB criteria. The Navy will review the states GA leaching criteria and note any differences since GB leaching criteria was originally used as part of the soil COC selection process. It is not anticipated that comparison to GA leaching criteria will affect any conclusions to the FS. The comparison will be discussed in the Technical Memorandum.

Comments addressed under Part 5 above:

Comment 9: *Page 1-17, 3rd Paragraph – Remove all discussion of State groundwater standards and refer only to federal standards.*

Response: As discussed above the, Navy prefers to cite the federal criteria but to also retain the state criteria parenthetically.

Comment 12: *Page 1-20, 1st Groundwater Bullet - Do not cite RIDEM GA objectives or GB criteria, instead refer to federal criteria; second groundwater bullet – Cite to federal health advisory standard (see comment 7), not RIDEM standard.*

Response: As discussed above the, Navy prefers to cite the federal criteria but to also retain the state criteria parenthetically.

Comment 15: *Page 1-22, Section 1.8.8 – Remove all discussion of State groundwater standards and refer only to federal standards.*

Response: As discussed above the, Navy prefers to cite the federal criteria but to also retain the state criteria parenthetically.

Comment 20: *Page 1-29, 1st Paragraph – In the fifth sentence that lists why use of drinking water is unlikely, remove the reference to the State's drinking water classification.*

Response: Please refer to the general response to comments in Part 5.

Comment 29: *Page 2-4, 1st Paragraph – The selection of state soil remediation standards should be based drinking water being under the site (since this is consistent with federal drinking water standards), not GB classified groundwater.*

Response: As discussed above the Navy will evaluate state soil remediation standards based on GA classified groundwater. A discussion of this evaluation will be presented in the technical memorandum.

Comment 44: *Page 2-27, 2nd Paragraph – In the third sentence if RI soil remediation standards are to be use, they should be based on GA leachability criteria.*

Response: Please refer to the response to Comment 29.

Part 6: Response to comments requesting clarification on whether PAHs resulting from burning TPH are a CERCLA issue

The following is a response to comments that request clarification if PAHs are CERCLA contaminants. This response addresses the comments numbered 11, 13, and 14 in part, or in entirety.

Response: The EPA has commented that if PAHs are a constituent of TPH, PAHs would not be a CERCLA contaminant; however, if the PAHs were produced by alteration of the petroleum through burning then they would be considered a CERCLA contaminant (Comment 11). Since petroleum products were routinely burned as part of the operations of OFFTA it can be stated that PAHs detected at the site are likely a combination of burned and unburned petroleum products, but since they cannot be separated, PAHs will be considered as CERCLA contaminants in the FS. The technical memorandum will clarify that PAHs are considered CERCLA contaminants at the OFFTA site.

Comments addressed under Part 6 above:

Comment 11: *Page 1-20, 2nd Paragraph – Regarding the first sentence, as per EPA guidance, TPH and constituents of TPH are not under the jurisdiction of CERCLA. However, if PAH were produced by alteration of petroleum through burning or mixing with CERCLA wastes, then the constituents would fall under CERCLA jurisdiction. Please clarify this in the text.*

Response: This will be clarified in the technical memorandum.

Comment 13: *Page 1-21, Sediment Bullets – Clarify if there are any exceedances from CERCLA contaminant sources. Add a separate bullet presenting information that sediment sampling in 2002, 2004, 2005 did not detect sediment contaminants above PRGs.*

Response: This will be clarified in the technical memorandum.

Comment 14: *Page 1-21, Section 1.8.7 – See comment 11 regarding both TPH and the constituents of TPH not being under CERCLA jurisdiction.*

Response: The presentation of the state standards should remain because they are enforced by state law. The technical memorandum will clarify that TPH and its constituents are not addressed under CERCLA.

Part 7: Response to comments specific minor text changes and or additions.

The following is a response to comments that request minor text changes or moving of various citations in the ARAR tables. This response addresses the comments numbered comments 17, 39, 47, 73, 74, 81, 82, 83, 84, 85, 86, 88, 91, 92, 93, 101, 102, 103, 104, 105, 106, 107, 109, 110, 113,114 in part, or in entirety.

General Response: The EPA has commented on several text changes within the document. The Navy will make the requested modifications discussed below to the FS report through change pages.

Comments addressed under Part 7 above:

Comment 17: *Page 1-22, Last Paragraph – Note in the text in the last sentence that the 1 mg/kg is the TSCA risk-based level for unrestricted residential exposure.*

Response: This will be noted in the text.

Comment 39: *Page 2.19, Section 2.2.6, 1st Paragraph – a) 4th Sentence: Add close parentheses after “commercial”. b) In the fifth sentence, replace “Environmental Land Use restriction (ELUR)” with “land use restrictions.” ELURs are not a component of the Base Instruction, but state-compliant land use restrictions would be established if the Navy were to transfer the property, through a deed. c) 6th Sentence – Delete “and ecological”*

Response: The requested changes will be made.

Comment 47: *Page 2-30, 5th Bullet – The volume of contaminated soil within 12 feet of buildings should be included in the calculations because it still requires remedial action (in the form of use restrictions), even if the are physical restrictions on removing it.*

Response: The volume of contaminated soil within 12 feet of the building will be included in the total volume of contaminated material discussed in the text, however, the volumes of soils that will be excavated and disposed of will not be revised since there is still physical restrictions from removing it.

Comment 73: *Page 5-13, 2nd Paragraph – In the second sentence replace “federal and state water quality standards” with “federal risk guidances and state remediation regulations.”*

Response: The requested revision will be made.

Comment 74: *Page 5-14, 5th Paragraph – In the last sentence insert “EPA and” before “RIDEM.”*

Response: The requested revision will be made.

Comment 81: *Table 2-1, Page 1 – Add:*

<p><i>Recommendations of the Technical Review Workgroup for Lead for an Approach to Assessing Risks Associated with Adult Exposure to Lead in Soil</i></p>	<p><i>To Be Considered</i></p>	<p><i>EPA guidance for evaluating the risks posed by lead in soil.</i></p>	<p><i>Guidance on assessing lead-impacted soil exceeding adult (and child) risk levels in residential use scenarios.</i></p>
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Response: The requested revision will be made.

Comment 82: Table 2-1, Page 2, Remediation Regulations Section 8.03 – Remove this line since previous line cites all of Section 8 of the Remediation Regulations. (Note that Section 8.03 is Applicable, not To Be Considered).

Response: The requested revision will be made.

Comment 83: Table 2-1, Page 2, Water Pollution Control – Move to the action-specific table for monitoring.

Response: The requested revision will be made.

Comment 84: Table 2-1, Page 2, RI Contaminated Soil Policy – Remove since petroleum standards are not part of the CERCLA remedy and are not ARARs.

Response: The requested revision will be made.

Comment 85: Table 2-1, Page 2, RI Air Quality Regulations – Move to action-specific table.

Response: The requested revision will be made.

Comment 86: Table 2-2 - Location-specific ARARs and TBCs is missing from the Draft Final document. In particular, note that the Floodplain and Wetlands Executive Orders, codified at 40 C.F.R. Appendix A) have been removed from the C.F.R. and should be removed from the location-specific ARARs Tables.

Response: The requested revisions will be made.

Comment 88: Table 2-3, Page 1 – As previously requested by EPA add federal Clean Water Act Pretreatment Standards, 40 C.F.R. 403, for discharging treatment water to a POTW.

Response: The requested revision will be made.

Comment 91: Table 2-3, Page 1, RI Water Quality Regulations – Under Consideration as add “will be used to develop long-term monitoring standards.”

Response: The requested revision will be made.

Comment 92: Table 2-3, Page 2 – As previously requested by EPA add the RI Pollutant Discharge Elimination System Pretreatment Regulations, RIGL 46-12, 42-17, 42-45.

Response: The requested revision will be made.

Comment 93: Table 2-3, Page 2 – RI dredging standards (citation provided by RIDEM) should be cited for O&M of the revetment.

Response: The requested revision will be made.

Comment 101: Table 4-2, p. 1 – Alternative 4, Compliance with Chemical-Specific ARARs should be “Yes.”

Response: The requested revision will be made.

Comment 102: Table 4-3 – Add:

<i>Recommendations of the Technical Review Workgroup for Lead for an Approach to Assessing Risks Associated with Adult Exposure to Lead in Soil</i>	<i>To Be Considered</i>	<i>EPA guidance for evaluating the risks posed by lead in soil.</i>	<i>This alternative will not meet this standard since it will not address lead-impacted soil exceeding adult (and child) risk levels.</i>
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Response: The requested revision will be made.

Comment 103: *Table 4-6 – Add:*

<i>Recommendations of the Technical Review Workgroup for Lead for an Approach to Assessing Risks Associated with Adult Exposure to Lead in Soil</i>	<i>To Be Considered</i>	<i>EPA guidance for evaluating the risks posed by lead in soil.</i>	<i>This alternative will meet this standard by excavating and treating lead-impacted soil exceeding adult (and child) industrial/commercial risk levels and establishing land use controls to address remaining residential risks.</i>
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Move RI Air Quality Regulations to the Action-Specific ARARs table.

Response: The requested revision will be made.

Comment 104: *Table 4-7, Page 1, Floodplain Management – Remove since regulation removed from the C.F.R. Compliance with federal Executive Order to be addressed under the Protectiveness criterion, rather than the ARARs criterion.*

Response: The requested revision will be made.

Comment 105: *Table 4-7, Page 1 – CWA Section 404 citation should be: “Clean Water Act, Sec 404 (33 U.S.C. § 1344); Section 404(b)(1) Guidelines for Specification of Disposal Sites for Dredged or Fill Material (40 C.F.R. Part 230, 231 and 33 C.F.R. Parts 320-323).” Move the first sentence of the Synopsis that describes O&M of the revetment to the last sentence of the Action to be Taken column.*

Response: The requested revision will be made.

Comment 106: *Table 4-7, Page 2, Protection of Wetlands – Remove since regulation removed from the C.F.R. Compliance with federal Executive Order to be addressed under the Protectiveness criterion, rather than the ARARs criterion.*

Response: The requested revision will be made.

Comment 107: *Table 4-7, Page 2 – Add:*

<p><i>Fish and Wildlife Coordination Act (16 U.S.C 661 et seq.)</i></p>	<p><i>Applicable</i></p>	<p><i>Requires Federal agencies involved in actions that will result in the control of structural modification of any stream or body of water for any purpose, to take action to protect the fish and wildlife resources that may be affected by the action. The Navy must coordinate with appropriate federal and state resource agencies to ascertain the means and measures necessary to mitigate, prevent, and compensate for project-related losses of fish and wildlife resources and to enhance the resources.</i></p>	<p><i>Measures to mitigate or compensate adverse project-related impacts to fish and wildlife resources will be taken, if determined necessary. The appropriate federal and state resource agencies will be consulted, in particular regarding any revetment O&M.</i></p>
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<p><i>Endangered Species Act (16 U.S.C. 1531 et seq.; 50 C.F.R. Parts 200 and 402.)</i></p>	<p><i>Applicable</i></p>	<p><i>Regulates activities affecting federally-listed endangered or threatened species or their critical habitat.</i></p>	<p><i>The federally-listed loggerhead turtle (Carette caretta) and Kemp's ridley turtle (Lepidochelys kempii) occur in the waters of Narragansett Bay. Appropriate federal agencies will be consulted to find ways to minimize adverse effects to listed species from the O&M of the revetment.</i></p>
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Rhode Island Requirements

<p><i>Rhode Island Endangered Species Act (RIGL 20-37-1 et seq.)</i></p>	<p><i>Applicable</i></p>	<p><i>Regulates activities affecting state-listed endangered or threatened species or their critical habitat.</i></p>	<p><i>The state-listed loggerhead turtle (Carette caretta) and Kemp's ridley turtle (Lepidochelys kempii) occur in the waters of Narragansett Bay. Appropriate federal agencies will be consulted to find ways to minimize adverse effects to listed species from the O&M of the revetment.</i></p>
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Assuming no Historic Preservation standards need to be cited.

Response: The requested revision will be made, although the citation will clarify that the Navy will coordinate with the appropriate state agencies rather than consult with them.

Comment 109: *Tables 4-9 thru 4-14 – Make the changes noted for the Alternative 2 ARARs tables to the Alternative 3 and 4 ARARs tables.*

Response: The alternative 3 and 4 ARAR tables will be made consistent with the Alternative 2 ARAR tables consistent with the responses to comments on those tables.

Comment 110: *Table 4-15 – Under location-specific ARARs it notes Alternative 2-4 will meet historic preservation regulations, but none are cited in the ARARs tables. Alternative 2-4, under Action-Specific ARARs will all require land use controls, long-term monitoring of groundwater and sediment, and establishment of compliance boundaries.*

Response: Historic preservation requirements will be removed from this table. The long term monitoring of sediment and groundwater will remain with the sediment and groundwater alternative to be consistent with the responses to comments regarding establishment of the waste management area and elimination of the sediment and groundwater alternatives.

Comment 113: *Tables 5-3 and 5-6 – Under the Remediation Regulations, Action to be Taken remove the “implausible” from the text. For Table 5-3 in the Action to be Taken state that the No Action alternative will not meet the risk based standards established by the federal TBCs or the State Remediation Regulations.*

Response: The requested revision will be made.

Comment 114: *Table 5-7 – Add additional location-specific ARARs if monitoring activities, in particular the installation or O&M of monitoring wells or sediment sampling will effect protected resources (wetlands, floodplain, endangered species, historic properties). See the location-specific ARARs cited for soil.*

Response: Please refer to response for Comment 107

Part 8: General Clarifications of text within the Report

The following is a response to comments that request clarification or additional information be added to the report. This response addresses the comments numbered comments 8 and 16. The comments and responses are listed below.

General Response: The EPA has asked for a couple of clarifications within the FS report. The Navy will add additional information discussed below to the FS report through change pages.

Comments addressed under Part 8:

Comment 8: *Page 1-16, Discussion of soil background – If the soil background study met EPA standards for determining background state so in the text. If not, remove all discussion of background and don't use the calculated "background" levels in the FS.*

Response: The text will be revised to reflect the EPA's acceptance of the Background Study.

Comment 16: *Page 1-22, Navy RTC 38 – The revised text still does not identify the regulatory or risk-based standards used to determine why no pesticides qualified as COPCs.*

Response: Pesticides were not selected as COPCs because of a low frequency of detection as described in Section 6.6.3.1 of the Remedial Investigation Report. This will be added to the text of the FS report.