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U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Admin.
National Ocean Service
Office of Ocean Resource Conservation and Assessment
Hazardous Materials Response and Assessment Division
c/o EPA Office of Site Remediation and Restoration (HIO)
1 Congress Street
Boston, MA 02114
11 February 2003

Ms. Kymberlee Keckler
U.S. EPA Waste Management Division
1 Congress Street
Boston, MA 02114

Mr. James Shafer
U.S. Department of the Navy
Northern Division - NAVFAC
10 Industrial Highway
Code 1811/PO - Mail Stop 82
Lester, PA 19113-2090

Dear Kymberlee/Jim:

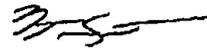
Thank you for the Work Plan for RI Site 17, Building 32, Gould Island, NETC dated January 2003. Of particular interest to NOAA are the ecological risk assessment and its evaluation of effects to those organisms residing in the intertidal and subaqueous environments as well as the habitat itself. Because a screening level ERA is planned, and such an exercise is now routine at new Navy sites, comments are relatively minor; they are numbered below

1. In June of 1997 NOAA reviewed "Work Plan for Remedial Investigation, Gould Island Electroplating Shop, Naval Education and Training Center, Newport, Rhode Island," prepared by Brown & Root Environmental, May 1997. Yet, this document is not mentioned. NOAA is somewhat confused why that workplan was not used and is now ignored. At that time, NOAA suggested several more sediment samples and we note now that the Navy plans to collect 10 samples potentially indicating impacts from the site and one reference sample.
2. In the second paragraph on Page 3-29 (Section 3.2.2.1 Sediment Sampling) the authors state that if depositional sediments are located, a 6-12 inch sample will also be collected. Can one then assume that if sediment depth is greater than 6 inches another deeper sample will be collected in all such locations? In addition, NOAA made note in our June 1997 review that since the site has not been active for 50 years, it is possible that any sediment contamination may be found in deeper sediments rather than in surficial sediments. It may be worth considering taking a sediment core at one of the sampling stations and conducting chemical analyses at different horizons along the core to determine if contamination is present in deeper sediments.

3. Figure 2-2 shows all of the landings demolished. Including the one they I used when I visited the site in 2000. Or so it seems. How does one reach the island?
4. Section 3.2.4.4 (Review of Threatened and Endangered Species) mentions that RIDEM and the USFWS Endangered Species lists will be reviewed but ignores those managed by NOAA. Please include these potentially impacted marine endangered species, if present.
5. In July of 2000, NOAA reviewed a document that reported very high inorganic, particularly cadmium, concentrations from sediment in the outfall drains. Although the discharge points of the outfalls will be sampled as discussed in the workplan, the sediment in these pipes should also be sampled. There is some concern that the outfalls could be acting as continuing sources of contamination to the marine environment around Gould Island. Because of their age, their integrity is in question, and it is possible that contamination in subsurface soils and groundwater could be leaching into these outfalls through cracks or joints and discharging to Narragansett Bay. Regardless of the sediment sampling results, it is recommended that these outfalls be removed and pipes remaining beneath the facility be filled in with cement to prevent any possible future contamination from these potential sources.
6. NOAA recalls that the Army Corps of Engineers is managing the other waste sites on Gould Island. Is that still valid and if so, what is the status of these other sites?

Please let me know if you have questions or comments.

Sincerely,



Kenneth Finkelstein, Ph.D.

CC: Bart Hoskins (EPA)

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