RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767 TDD 401-831-5508

April 13, 1999

James Shafer, Remedial Project Manager
U.S. Department of the Navy
Northern Division
Naval Facilities Engineering Command
10 Industrial Highway
Code 1823-Mail Stop 82
Lester, PA 19113-2090

RE: Derecktor Shipyard Draft Final Feasibility Study, Naval Education and Training Center, Newport, Rhode Island

Dear Mr. Shafer:

The Office has reviewed the Draft Feasibility Study for the Derecktor Shipyard Site, dated 29 September 1998. Attached are comments generated as a result of this review.

The Office is aware that issues concerning the Human health Risk Assessment, PRGs, restrictions implementability, etc. may affect the scope or nature of the Feasibility Study. It is expected that these issues will be resolved prior to the submission of the final document. Accordingly, additional comments may be sent out at a latter date upon resolution of these issues. If the Navy has any questions concerning the above, please contact this Office at (401) 277-2797 ext. 7111.

Sincerely,

Paul Kulpa

Paul Kulpa, Project Manager
Office of Waste Management

cc: Warren S. Angell, DEM DSR
Richard Gottlieb, DEM DSR
Christopher Deacutis, DEM DWS
Robert Richardson, DEM DWS
Kymberlee Keckler, EPA Region I
Melissa Griffen, NETC

derfs com

Comments on the Draft Final
Feasibility Study Derecktor Shipyard

18. Alternative 3A:Limited Removal and Off-Base Disposal; Appendix D.

This section of the report proposes the use of a complex dewatering system hydrocyclone, plate and frame filter press, pH adjustment, etc. Normally, a simple gravity dewatering system is employed, sediments are stockpiled and the water is removed from the sediment by gravity and is collected in berms which surround the stock pile. It is assumed that the costly, complex approach proposed in this plan for weight reduction which would manifest itself in cost savings for dredge spoil disposal. Please confirm and provide the engineering economic analysis in support of the proposal.

Evaluation of Response

The Navy has indicated that the fine grain nature of the sediments and the time needed for gravity dewatering dictates the use of the proposed method. The report should provide the information in support of this position. In addition, please provide examples where the proposed treatment process has been employed.

19. Appendix D

Please provide the documentation in support of the cost estimates contained in this study. Documentation would be similar in nature to that submitted for the McAllister Point Feasibility Study.

20. General Comment

Throughout the report the acroymn NETC has been replaced with NSN to reflect changes in the name of the Naval base. This is appropriate for those sections of the report which are referring to the name of the Naval base. It is not appropriate for those sections of the report which are referring to the name of the Superfund site. The site is listed on CERCLA as Naval Education and Training Center (NETC) and should designated as such where appropriate.