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C-NAVY-4-99-1343W

April 16, 1999

Project Number 7752

Mr. James Shafer
Remedial Project Manager
Northern Division, Naval Facilities Engineering Command
10 Industrial Highway, Mail Stop 82
Lester, Pennsylvania 19113

Reference: CLEAN Contract No. N62472-90-D-1298
Contract Task Order No. 0302 - Naval Station Newport, Newport Rhode Island

Subject: Responses to Comments, Derecktor Shipyard Draft Final FS Report

Dear Mr. Shafer:

Attached are responses to comments to the Draft Final Feasibility Study for Derecktor Shipyard at Naval Station Newport in Newport Rhode Island, dated February 11, 1999. Comments were provided by the USEPA on March 13, 1999 (Attachment A) and additional comments were provided by the RIDEM on April 13, 1999 (Attachment B)

Many of the issues described in the letter have been resolved with respect to McAllister Point Landfill. However, it would be advisable to hold a conference call to discuss other issues as described in the responses. 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
Project Manager

SSP/
attachment

- c: M. Griffin, NSN (w/encl. - 4)
- K. Keckler, USEPA (w/encl. - 3)
- P. Kulpa, RIDEM (w/encl. - 4)
- J. Stump, Gannett Fleming (w/encl. - 2)
- K. Finkelstein, NOAA (w/encl. - 1)
- D. Egan, TAG (w/encl. - 1)
- Restoration Advisory Board (w/encl. - 4)
- J. Trepanowski/G. Glenn, B&RE (w/encl. - 1)
- File 7752-3.2 (w/o encl.)

ATTACHMENT A
Responses to Comments received from USEPA
On the Draft Final FS For Derecktor Shipyard Off-Shore
Comments received March 12, 1999

| <u>Page</u> | <u>Comment</u> |
|---|--|
| <p>X p. 1-21, §1.4.1</p> <p><i>NO ACTION</i></p> <p>Response:</p> | <p>EPA previously requested that the text implying that the PCB contamination in the off-shore area is from sources other than NETC/Derecktor Shipyard (<i>i.e.</i>, rivers that discharge to Narragansett Bay, atmospheric deposition, <i>etc.</i>) be either deleted or substantiated with relevant facts and references. The text has not been revised as requested.</p> <p><i>The revisions proposed in the response to the previous comment were made. The text is correct as currently stated.</i></p> |
| <p>X Table 2-1</p> <p>Response:</p> | <p>Two footnotes were added to the table presenting PRGs that state that the ecological PRGs are based on an HQ of 2 or more and that the human health PRGs are based on an HQ of 10 or more. These footnotes are misleading and should be deleted. It is not appropriate to characterize the human health PRG as based on an HQ of 10 because the PRG is not based solely on noncarcinogenic risk. The PRGs represent an acceptable carcinogenic risk</p> <p><i>The Navy concurs, and this revision will be made.</i></p> |
| <p>X p. 4-4, Table 4-1</p> <p>Response:</p> | <p>The sediment volumes presented for Alternative 3B have not been revised when the alternative was modified. The sediment volumes should be 24,360 cubic yards for the Subtitle D Landfill estimate and 6,090 cubic yards for the Subtitle C Landfill estimate.</p> <p><i>The Navy concurs, and this revision will be made.</i></p> |
| <p>X Figure 4-3</p> <p>Response:</p> | <p>The table presenting the estimated sediment volumes incorrectly identifies the station numbers. Station 27 and 29 are presented twice in the station column, but the area and volumes appear to be in order. Except, the volume for station 28 is presented as 15,542 but should be 15,547 cubic yards as stated in Appendix C.</p> <p><i>The Navy concurs, and this revision will be made.</i></p> |
| <p>X p. 4-14, §4.2.3</p> <p>Response:</p> | <p>Although the sediment volume presented on page 4-13 was corrected as requested in the previous EPA comment; the 80% volume and the 20% volume presented on page 4-14 have not been corrected. A check of all presented sediment volumes throughout the section should be made and values corrected as necessary.</p> <p><i>The Navy concurs, and this revision will be made.</i></p> |

X p. 4-16, ¶2

Remove the fourth sentence. The viability of the alternative depends on a number of factors, particularly compliance with ARARs. In the fifth sentence remove "also" before "will allow."

Response: *The Navy concurs, and this revision will be made.*

X p. 5-8, Table 5-1

Change the status of the federal Clean Water Act, Section 304 and State Water Pollution Control from "To Be Considered" to "Relevant and Appropriate."

X For the Clean Water Act, Section 304 Synopsis, change "Non Enforceable guidelines" to "Guidelines."

X For both the Clean Water Act, Section 304 and State Water Pollution Control, change the Action to be Taken to "These standards are relevant and appropriate for sediment PRGs derived using these water quality criteria (including equilibrium partitioning). This alternative fails to meet this standard since sediment PRGs derived from water quality criteria are not adequately addressed by the remedy."

Response: *The EPA has been adamant in this interpretation that because the PRGs were developed through equilibrium partitioning, the AWQC are ARARs. In accordance with the agreements made for similar interpretations for the marine FS at McAllister Point Landfill, the Navy concurs and these revisions will be made..*

X p. 5-11, ¶1

Replace this paragraph with: "Alternative 1 fails to meet sediment PRGs that have been derived from federal and state water quality chemical-specific ARARs. There are no location-specific or action-specific ARARs for this alternative."

Response: *In accordance with the agreements made for similar interpretations for the marine FS at McAllister Point Landfill, the Navy concurs, and this revision will be made.*

X p. 5-12, ¶1

The second sentence discusses access restrictions to recreational and commercial fishing boats, however elsewhere in the document the access restrictions are described for shore access only, not for boat access. The fishing ban proposed is for shellfish and lobsters only - not finfish. Is the proposal to close the area to all vessels or to prevent them from shellfishing or lobstering?

No change Response: *The access restrictions evaluated under all the alternatives include a No-access area demarcated by buoys and signs on the seaward side of the site. The intention is to exclude recreational and fishing boats from the area. Navy ships would move in and out as needed (Table 4-3 and page 4-7 of the FS).*

X p. 5-12, §5.2.2

Given the mobility of lobsters and scallops and uncertainties associated with enforcement of the ban, the FS text should be revised to explain the limited effectiveness of the proposed shellfishing ban.

Response: *The Navy concurs, and this revision will be made.*

p. 5-13, ¶5

Replace this sentence with: "Alternative 2 fails to meet sediment PRGs that have been derived from federal and state water quality chemical-specific ARARs."

Response: *In accordance with the agreements made for similar interpretations for the marine FS at McAllister Point Landfill, the Navy concurs, and this revision will be made.*

p. 5-13, ¶6

Remove this paragraph. To the beginning of the seventh paragraph, add: "Alternative 2 fails to meet location-specific ARARs that require that the action proposed be protective of wetland and flood plains."

Response: *In accordance with the agreements made for similar interpretations for the marine FS at McAllister Point Landfill, the Navy concurs, and this revision will be made.*

In the seventh paragraph change "action-specific ARARs" to "location-specific ARARs."

Response: *The Navy concurs, and this revision will be made.*

Add a new seventh paragraph that states: "The monitoring and installation of access restrictions will comply with action-specific ARARs that include the handling of potentially contaminated sediments."

Response: *The meaning of the proposed language is unclear. The action specific ARARs under this alternative will be met through placement of fixed and floating markers in accordance with navigation and rivers and harbors regulations.*

p. 5-14, Table 5-4

Change the status of the federal Clean Water Act, Section 304 and State Water Pollution Control from "To Be Considered" to "Relevant and Appropriate."

For the Clean Water Act, Section 304 Synopsis, change "Non Enforceable guidelines" to "Guidelines."

For both the Clean Water Act, Section 304 and state Water Pollution Control change the Action to be Taken to "These standards are relevant and appropriate for sediment PRGs derived using these water quality criteria (including equilibrium partitioning). This alternative fails to meet this standard since sediment PRGs derived from water quality criteria are not adequately addressed by the remedy."

Response: *In accordance with the agreements made for similar interpretations for the marine FS at McAllister Point Landfill, the Navy concurs, and this revision will be made.*

pp. 5-15 to 5-17

Replace Table 5-5 with the Table 5-5 supplied previously by EPA (attached) that included federal floodplain protection provisions.

Response: *The EPA and Navy came to agreement on this issue with the language that is included in other tables in the draft Final FS. The floodplain protection regulations will be added to the existing Table 5-5.*

p. 5-18

Replace Table 5-6 with revised Table 5-6 (attached).

Response: *The cited text is taken directly from the discussions that were held at the meeting on January 20, 1999 at NSN, and all parties indicated agreement with the statement at that time. This passage is critical to future documents for the site,*

as it is necessary to justify elements of the alternative. Therefore, the Navy proposes to leave the language as it was agreed to at the meeting.

✓ p. 5-21, ¶2

This paragraph discusses access restrictions to recreational and commercial fishing boats. Elsewhere in the document the access restrictions are described for shore access only, not for boat access. The fishing ban proposed is for shellfish and lobsters only - not finfish. Is the proposal to close the area to all vessels or to prevent them from shellfishing or lobstering?

No Action

Response:

The access restrictions evaluated under all the alternatives include a No-access area demarcated by buoys and signs on the seaward side of the site. The intention is to exclude recreational and fishing boats from the area. Navy ships would move in and out as needed (Table 4-3 and page 4-7 of the FS).

X p. 5-23, ¶5

Replace "There are no chemical-specific ARARs for this alternative" with "Alternative 3A meets sediment PRGs that have been derived from federal and state water quality chemical-specific ARARs through dredging and permanent removal."

✓ Response:

In accordance with the agreements made for similar interpretations for the marine FS at McAllister Point Landfill, the Navy concurs, and this revision will be made.

✓ p. 5-23, ¶6

Remove the second and third sentences. In the fourth sentence change "However, mitigation" to "Mitigation."

No Action

Response:

Removal of the second and third sentences would remove the Navy's written justification from the record that the seafloor does not need to be mitigated. It has been our experience that taking out language that may seem superfluous may later cause a different interpretation to be made (i.e. for key aspects of the remedial design). Therefore, since the two sentences do not change the interpretation, and the comment does not seem to be objecting to that interpretation, the Navy proposes to leave the language of the paragraph as it currently stands.

✓ p. 5-24, ¶2

Remove the last sentence.

No Action

Response:

The cited text is taken directly from the discussions that were held at the meeting on January 20, 1999 at NSN, and all parties indicated agreement with the statement at that time. This passage is critical to future documents for the site, as it is necessary to justify elements of the alternative. Therefore, the Navy proposes to leave the language as it was agreed to at the meeting.

p. 5-25, Table 5-7

Change the status of the federal Clean Water Act, Section 304 and State Water Pollution Control from "To Be Considered" to "Relevant and Appropriate."

For the Clean Water Act, Section 304 Synopsis, change "Non Enforceable guidelines" to "Guidelines."

For both the Clean Water Act, Section 304 and State Water Pollution Control change the Action to be Taken to "These standards are relevant and appropriate for sediment PRGs derived using these water quality criteria (including equilibrium partitioning). Sediments exceeding these PRGs will be dredged and permanently removed."

Response: *In accordance with the agreements made for similar interpretations for the marine FS at McAllister Point Landfill, the Navy concurs, and this revision will be made.*

p. 5-27 In Table 5-8 insert:

| | | | | |
|---|------------------------------|------------|--|--|
| Executive Order 11988 RE: Flood plain Management | 40 C.F.R. Part 6, Appendix A | Applicable | The Order requires Federal agencies to evaluate the potential effects of actions it may take within a designated 100-year Flood plain of a waterway to avoid adversely impacting flood plains wherever possible. | The potential for restoring and preserving flood plains so that their natural and beneficial values can be realized must be considered and incorporated into any plan or action wherever feasible. This Alternative addresses these requirements by dredging and removing contaminants that pose a risk to ecological receptors. |
|---|------------------------------|------------|--|--|

Response: *The passages above do not reflect the agreement that was made on January 20, 1999 on the manner in which the flood plains were to be addressed. At that meeting, it was agreed that the flood plain regulations only needed to be addressed in regards to the restoration of intertidal areas.*

X

The Navy proposes to include flood plain protection in the location-specific tables for this and other dredging alternatives as was agreed at the meeting held at NSN on January 20, 1999. In this manner the comment will be addressed.

p. 5-29, Table 5-9 Remove the last sentence under the RCRA C, Action to be Taken.

NO ARAR

Response: *The cited text is taken directly from the discussions that were held at the meeting on January 20, 1999 at NSN, and all parties indicated agreement with the statement at that time. This passage is critical to future documents for the site, as it is necessary to justify elements of the alternative. Therefore, the Navy proposes to leave the language as it was agreed to at the meeting.*

Remove the Rivers and Harbors Act it is already cited as a location-specific ARAR.

Response: *The Navy concurs, this revision will be made.*

p. 5-31, Table 5-9 Remove the citation to the Operation and Maintenance of Wastewater Treatment Plants since the water treatment proposed is not a wastewater treatment plant as defined under these regulations.

Response: *The Navy concurs, this revision will be made.*

Remove the citation to the Coastal Resources Management since it is listed as a location-specific ARAR.

Response: The Navy concurs, this revision will be made.

p. 5-37, ¶5

Replace this sentence with: "Alternative 3B fails to meet sediment PRGs that have been derived from federal and state water quality chemical-specific ARARs."

~~No Action~~
Response:

Since an action level of 3 times the baseline PRG was selected to protect ecological receptors at McAllister Point Landfill (a relatively remote site with some ecological significance), it should be appropriate for the risk management process to select a level equal to that or higher for Coddington Cove (an industrial port). The Navy proposes to leave this section as it is currently stated.

~~F~~
p. 5-37, ¶6

Remove the first through the third sentences and insert: "Alternative 3B fails to meet location-specific ARARs that require that the action proposed be protective of wetland and flood plains because it will leave sediments posing a risk to ecological receptors." In the fourth sentence change "However, mitigation" to "Mitigation."

Response:

~~No Action~~

Removal of the second and third sentences would remove the Navy's justification from the record that the seafloor does not need to be mitigated. It has been our experience that taking out language that may seem superfluous may later cause a different interpretation to be made by other parties (i.e. for key aspects of the remedial design). Therefore, since the two sentences do not change the interpretation, and since the comment does not seem to be objecting to that interpretation, the Navy proposes to leave the language of the paragraph as it currently stands.

Regarding the first sentence, EPA has been adamant that the presence of contaminants above PRGs is a violation of ARARs since the PRGs were developed from AWQC through equilibrium partitioning. In accordance with the agreements made for this interpretation for the marine FS at McAllister Point Landfill, the Navy concurs, and this revision will be made.

→ ✓

p. 5-37, ¶7

Remove the last sentence.

~~No Action~~
Response:

The cited text is taken directly from the discussions that were held at the meeting on January 20, 1999 at NSN, and all parties indicated agreement with the statement at that time. This passage is critical to future documents for the site, as it is necessary to justify elements of the alternative. Therefore, the Navy proposes to leave the language as it was agreed to at the meeting.

p. 5-38, Table 5-10

Change the status of the federal Clean Water Act, Section 304 and State Water Pollution Control from "To Be Considered" to "Relevant and Appropriate."

✓

For the Clean Water Act, Section 304 Synopsis, change "Non Enforceable guidelines" to "Guidelines."

~~d~~

For both the Clean Water Act, Section 304 and State Water Pollution Control change the Action to be Taken, change to: "These standards are relevant and appropriate for sediment PRGs derived using these water quality criteria (including equilibrium partitioning). This alternative fails to meet this standard since sediment PRGs derived from water quality criteria are not adequately addressed by the remedy."

Response: *In accordance with the agreements made for similar interpretations for the marine FS at McAllister Point Landfill, the Navy concurs, and this revision will be made.*

p. 5-39 Replace Table 5-11 with the Table 5-11 supplied previously by EPA (attached) that included federal floodplain protection provisions.

✓ Response: *The Navy proposes to include flood plain protection in the location-specific tables for this and other dredging alternatives as was agreed at the meeting held at NSN on January 20, 1999. In this manner the comment will be addressed.*

p. 5-42, Table 5-12 Under RCRA C, Action to be Taken, remove the last sentence.

No Action
Response: *The cited text is taken directly from the discussions that were held at the meeting on January 20, 1999 at NSN, and all parties indicated agreement with the statement at that time. This passage is critical to future documents for the site, as it is necessary to justify elements of the alternative. Therefore, the Navy proposes to leave the language as it was agreed to at the meeting.*

Remove the Rivers and Harbors Act. It is already cited as a location-specific ARAR.

✓ Response: *The Navy concurs. This revision will be made.*

p. 5-44, Table 5-12 Remove the citation to the Operation and Maintenance of Wastewater Treatment Plants because the water treatment proposed is not a wastewater treatment plant as defined under these regulations.

✓ Response: *The Navy concurs. This revision will be made.*

Remove the citation to the Coastal Resources Management since it is listed as a location-specific ARAR.

✓ Response: *The Navy concurs. This revision will be made.*

✓ p. 5-45, ¶2 Insert at the end of the sentence: “, however, the alternative would leave contaminated sediments that exceed PRGs for ecological receptors. Therefore, risk to ecological receptors would remain.”

Response: *The Navy concurs that some risk to ecological receptors would remain under Alternative 3B. This statement will be added to the cited paragraph.*

✓ p. 5-45, ¶3 In the first sentence insert “but not eliminate” after “would reduce.”

Response: *The Navy concurs. This revision will be made. In fairness, no alternative would eliminate risk entirely, so the same language should be added to other alternative descriptions accordingly.*

✓ p. 5-49, ¶2
8

In the second sentence, replace “There are no chemical-specific ARARs for this alternative” with “Alternative 4 meets sediment PRGs that have been derived from federal and state water quality chemical-specific ARARs through dredging and permanent removal.”

Concur. - see e-mail 4-20-99

Response: The proposed revision states that WQC are enforceable ARARs for sediment because PRGs were developed using these WQC. Since the Navy is not in agreement with this interpretation, the Navy would prefer to discuss it further prior to making this change.

No Action
p. 5-49, ¶3

Remove the second and third sentences. In the fourth sentence change "However, mitigation" to "Mitigation."

Response: Removal of the second and third sentences would remove the Navy's written justification from the record that the seafloor does not need to be mitigated. It has been our experience that taking out language that may seem superfluous now, may later cause a different interpretation to be made (i.e. for key aspects of the remedial design). Therefore, since the two sentences do not change the interpretation, and the comment does not seem to be objecting to that interpretation, the Navy proposes to leave the language of the paragraph as it currently stands.

No Action
p. 5-49, ¶4

Remove the last sentence.

Response: The cited text is taken directly from the discussions that were held at the meeting on January 20, 1999 at NSN, and all parties indicated agreement with the statement at that time. This passage is critical to future documents for the site, as it is necessary to justify elements of the alternative. Therefore, the Navy proposes to leave the language as it was agreed to at the meeting.

p. 5-51, Table 5-13 Change the status of the federal Clean Water Act, Section 304 and State Water Pollution Control from "To Be Considered" to "Relevant and Appropriate."

For the Clean Water Act, Section 304 Synopsis - Change "Non Enforceable guidelines" to "Guidelines."

For both the Clean Water Act, Section 304 and State Water Pollution Control change the Action to be Taken to "These standards are relevant and appropriate for sediment PRGs derived using these water quality criteria (including equilibrium partitioning). Sediments exceeding these PRGs will be dredged and permanently removed."

Response: In accordance with the agreements made for similar interpretations for the marine FS at McAllister Point Landfill, the Navy concurs, and this revision will be made.

p. 5-52 In Table 5-14 insert:

| | | | | |
|--|------------------------------|------------|--|--|
| Executive Order 11988 RE: Flood plain Management | 40 C.F.R. Part 6, Appendix A | Applicable | The Order requires Federal agencies to evaluate the potential effects of actions it may take within a designated 100-year Flood plain of a waterway to avoid adversely impacting flood plains wherever possible. | The potential for restoring and preserving flood plains so that their natural and beneficial values can be realized must be considered and incorporated into any plan or action wherever feasible. This Alternative addresses these requirements by dredging and removing contaminants that pose a risk to ecological receptors. |
|--|------------------------------|------------|--|--|

Response: *The passages above do not reflect the agreement that was made on January 20, 1999 on the manner in which the flood plains were to be addressed. At that meeting, it was agreed that the flood plain regulations only needed to be addressed in regards to the restoration of intertidal areas.*

✓ *The Navy proposes to include flood plain protection in the location-specific tables for this and other dredging alternatives as was agreed at the meeting held at NSN on January 20, 1999. In this manner the comment will be addressed.*

p. 5-55, Table 5-15 Remove the last sentence from RCRA C, Action to be Taken.

~~NO~~
~~Response:~~ *The cited text is taken directly from the discussions that were held at the meeting on January 20, 1999 at NSN, and all parties indicated agreement with the statement at that time. This passage is critical to future documents for the site, as it is necessary to justify elements of the alternative. Therefore, the Navy proposes to leave the language as it was agreed to at the meeting.*

Remove the Rivers and Harbors Act citation. It is already cited as a location-specific ARAR.

✓ Response: *The Navy concurs, and this revision will be made.*

p. 5-57, Table 5-15 Remove the citation to the Operation and Maintenance of Wastewater Treatment Plants since the water treatment proposed is not a wastewater treatment plant as defined under these regulations.

✓ Response: *The Navy concurs, and this revision will be made.*

Remove the citation to the Coastal Resources Management since it is listed as a location-specific ARAR.

✓ Response: *The Navy concurs, and this revision will be made.*

✓ p. 5-60, ¶2 In the third sentence remove "subtidal" before "aquatic habitats."

Response: *The Navy concurs, and this revision will be made.*

✓ p. 5-61, ¶3 Replace this paragraph with: "Alternative 1 fails to meet sediment PRGs that have been derived from federal and state water quality chemical-specific ARARs. There are no location-specific or action-specific ARARs for this alternative."

Response: *In accordance with the agreements made for similar interpretations for the marine FS at McAllister Point Landfill, the Navy concurs, and this revision will be made.*

✓ p. 6-61, ¶4 Replace this paragraph with: "Alternative 2 fails to meet sediment PRGs that have been derived from federal and state water quality chemical-specific ARARs.

Alternative 2 also fails to meet location-specific ARARs that require that the action proposed be protective of wetland and floodplains since the proposed action does not adequately address risks posed by the contamination to be left in place. The monitoring and installation of access restrictions will comply with action-specific ARARs that include the handling of potentially contaminated sediments."

Response: *In accordance with the agreements made for similar interpretations for the marine FS at McAllister Point Landfill, the Navy concurs, and the first part of this revision will be made.*

It is not clear how the presence of contaminants in wetlands are a violation of the wetland and floodplains regulations. This was discussed at length on January 20, and it was agreed at that time that the EPA concern focused on protection and mitigation of disturbed habitats. Since this has been addressed in previous comments above, the Navy proposes to leave the second portion of the proposed text out of the revision.

p. 5-61, ¶5

Replace this paragraph with: "Alternative 3B fails to meet sediment PRGs that have been derived from federal and state water quality chemical-specific ARARs. Alternative 2 also fails to meet location-specific ARARs that require that the action proposed be protective of wetland and floodplains since the proposed action does not adequately address risks posed by the contamination to be left in place. The proposed partial dredging, monitoring, and installation of access restrictions will comply with action-specific ARARs that include the handling of potentially contaminated sediments.

Alternative 3A and 4 can be performed in accordance with all applicable chemical-, location-, and action-specific ARARs."

NB Asher
Response:

The reviewer is stating that Alternatives 3A and 4 are protective, but Alternative 3B is not. The reviewer should be aware that some risk to ecological receptors would remain under alternatives 3B, 3A, and 4. Each alternative allows some contaminants to stay, and each is more or less protective depending on the action levels stated. One cannot say that one is protective and the other is not. Each is somewhat protective, some more than others. This is what is stated in the cited text currently, and because it is correct, the Navy proposes to leave the text unrevised.



p. 5-61, ¶6

NB Asher
Response:

In the sixth sentence remove "somewhat" since the proposed alternative is not protective enough to meet regulatory requirements.

The reviewer is referred to the response to the comment to p. 5-61, ¶3 above. The paragraph cited is a discussion of effectiveness for protection of receptors, not compliance with ARARs.

Appendix B

The Appendix B cover sheet/divider sheet needs to be revised to reflect November 1998 Final PRG document.

✓ Response: *The Navy concurs, this revision will be made.*

Appendix C

Tables A, B, and C are presumably included to support the volume estimates; however, calculation worksheets are not provided in Appendix C that explain the assumptions and how the information presented in the Tables A, B, and C are translated into the depth of sediment that exceeds PRGs. Also, the tables need to be quality checked and corrected. The row identifiers "date sampled" and "depth in feet" are opposite of the information presented. This should be corrected. A few of the sample station identifiers appear to have been typed incorrectly. Lead data are not provided to assist in the estimation of the sediment volume that exceeds the lead PRG concentration. Data for all

contaminants for which PRGs are recommended should be included to support the volume estimates.

Response: *The Navy concurs, this revision will be made.*

✓ Appendix D, Alt 2 Under the estimated analytical costs of long-term monitoring (item #1) in Alternative 2, the 20 samples/yr. for biota chemistry, amphipod toxicity, and arbacia toxicity are not accurately costed. The cost appears to be for 10 samples per year instead of 20.

*Should be
10
=*

Response: *The Navy concurs, this revision will be made.*

✓ Appendix D, Alt 4 The area to be covered under alternative 4 requires 45 boring stations as shown in Figure 4-3. However, the number of boring stations presented in Appendix D is 52 and 52 borings is used for subsequent calculations. This number should be 45 and calculations corrected to reflect this change.

Response: *The Navy concurs, this revision will be made.*

ATTACHMENT B
Responses to Comments received from RIDEM
On the Draft Final FS For Derecktor Shipyard Off-Shore
Comments received April 13, 1999

18. Alternative 3A: Limited Removal and Off-Base Disposal;
Appendix D (Former Comment to Draft FS).

This section of the report proposes the use of a complex de-watering system hydrocyclone, plate and frame filter press, pH adjustment, etc. Normally, a simple gravity de-watering 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

~~Provided~~
Provided Additional info by e-mail 5-12-99

The Navy has indicated that the fine grain nature of the sediments and the time needed for gravity de-watering 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.

No Action ✓

Response: Grain size analysis is provided in Appendix A-1-5 of the ecological risk assessment. Percent silts are between 80 and 92 for the areas where dredging is proposed. The hydrocyclones and frame filter press proposed is a package system that is commonly used for sludge de-watering to allow transportation and disposal of solid materials taken from settling basins, sludge lagoons, and wastewater treatment facilities.

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.

No Action ✓

Response: The Navy is assembling this material and will forward it to the RIDEM prior to April 30, 1999.

provided w/ letter to Kulpa April 22, 1999

20. General Comment

Throughout the report the acronym 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.

Response: The requested revision will be made to the extent possible. However, additional text may be required to assure clarity and that the reader is not confused by the two names.

File: 7752-8.0

C: Parker

Parker, Stephen

From: Parker, Stephen
Sent: Tuesday, April 20, 1999 8:50 AM
To: 'Kymberlee Keckler, EPA Region I'; 'Jennifer Stump, Gannett Fleming'
Cc: 'Jim Shafer, Northdiv'
Subject: Derecktor FS response to Comments Errata

While revising the Draft Final FS report for Derecktor (off-shore), I found an error in our response summary dated April 16, 1999. On Page A-7, the last comment refers to p.5-49, P2. The response, presented on the top of page A-8 is incorrect, and should be struck. The response should read:

"In accordance with the agreements made for the McAllister Point Landfill Marine FS, the Navy concurs and this revision will be made."

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

-Stephen Parker
Tetra Tech NUS Inc.
978-658-7899
parkers@ttnus.com