



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

October 23, 2000

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

Re: Technical Review of the Draft Project Close-out Report for Various Removal Actions at the Derecktor Shipyard and Miscellaneous Investigations at Naval Station Newport

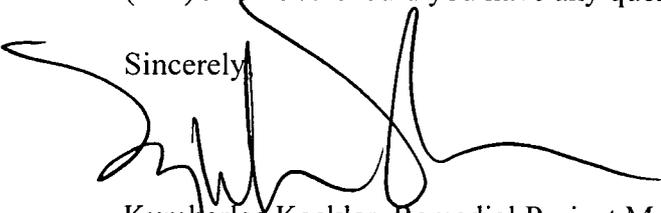
Dear Mr. Shafer:

EPA reviewed the *Draft Project Close-out Report Various Removal Actions at the Derecktor Shipyard and Miscellaneous Investigations at Naval Station Newport (NSN), Newport, Rhode Island* dated September 2000. The report documents the results of close-out activities at several sites and recommends no further action at these sites. EPA reviewed the document with particular attention to the completeness of the investigation, consistency of the interpretations with the data, and the appropriateness of the recommendations in light of the results obtained to date. Detailed comments are provided in Attachment A.

Sections 8.0 and 9.0 of this report state that the documentation and operations for these sites are complete. However, there appear to be many data sets missing from the report and no comparisons to Rhode Island Residential Direct Contact Exposure Criteria have been included. Neither the documentation nor the operations should be considered complete until the items identified in Attachment A have been adequately resolved.

I look forward to working with you and the Rhode Island Department of Environmental Management toward the cleanup of Derecktor Shipyard. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,



Kimberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: Paul Kulpa, RIDEM, Providence, RI
Melissa Griffin, NETC, Newport, RI
Jennifer Stump, Gannet Fleming, Harrisburg, PA
Mary Philcox, URI, Portsmouth, RI
David Egan, TAG recipient, East Greenwich, RI

ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. 14, §3.1.2	This section indicates that soils were analyzed for the eight RCRA metals by EPA Method 6010. Mercury analysis cannot be performed by Method 6010. Please provide the correct method reference for mercury.
p. 14, §3.1.2	This section indicates that detected concentrations were compared to the Rhode Island Residential Direct Contact Exposure Criteria. However, neither the Exposure Criteria nor the comparison of the analytical data to these standards is provided in the report. Please present a comparison of all analytical results to the Exposure Criteria.
p. 19, §4.3	This section indicates that confirmatory samples for the Building 42 S42-1 Sump Pit Removal were analyzed for the eight RCRA metals which includes only arsenic, barium, cadmium, chromium, lead, mercury, selenium and silver. However, the introduction to this section (page 18) indicates that elevated levels of zinc, copper and nickel were previously detected at this site. The confirmatory sampling performed does not address these three metals. Please include relevant confirmatory sampling data. Section 4.3 indicates that detected concentrations were compared to the Rhode Island Residential Direct Contact Exposure Criteria. However, neither the Exposure Criteria nor the comparison of the analytical data to these standards is provided in the report. Please provide a presentation of the comparison of all analytical results to the Exposure Criteria. Such information will be critical to future land use and remedial decisions. Section 4.3 indicates that for the confirmatory samples the only exceedance of the Exposure Criteria was for arsenic. Section 4.5 indicates that the site was backfilled with clean soil. Please discuss whether the arsenic concentrations are consistent with background.
p. 20, §5.1	The third paragraph of this section includes a reference to “Appendix 3.” Isn’t the correct reference “Appendix C?” Please correct.
p. 20, §5.1	Table 2 of this section presents data that were compared to the Rhode Island Residential Direct Contact Exposure Criteria. However, neither the Exposure Criteria nor the comparison of the analytical data to these standards is provided in the report. Please present the comparison of all analytical results to the Exposure Criteria.

- p. 21, §5.2 The last paragraph of this section states that no PCB exceedances were noted during the site investigation. However, the data for the twelve samples collected during this investigation are not presented in this report. In addition, neither the Exposure Criteria nor the comparison of the analytical data to these standards is provided in the report. Please provide the analytical data for the twelve samples collected during this activity and include a presentation of the comparison of all analytical results to the Exposure Criteria cited.
- p. 22, §5.3 Table 3 of this section presents data which were compared to the Rhode Island Residential Direct Contact Exposure Criteria. However, neither the Exposure Criteria nor the comparison of the analytical data to these standards is provided in the report. Please present a comparison of all analytical results to the Exposure Criteria.
- p. 23, §5.3 The last paragraph on this page indicates that eight confirmatory samples were taken after the expanded excavation at Test Pit 14 and that the data were compared to Rhode Island Residential Direct Contact Exposure Criteria. However, the data for the eight samples collected during this investigation are not presented in this report. In addition, neither the Exposure Criteria nor the comparison of the analytical data to these standards is provided in the report. Please provide the analytical data for the eight samples collected during this activity and present the comparison of all analytical results to the Exposure Criteria.
- p. 24, §5.3 The last paragraph in this section indicates that one confirmatory sample for benzo(a)pyrene was taken after the final excavation at Test Pit 14 and that the data were compared to Rhode Island Residential Direct Contact Exposure Criteria. However, the data for that sample are not presented in this report. In addition, neither the Exposure Criteria nor the comparison of the analytical data to these standards is provided in the report. Please provide the analytical data for the one sample collected during this activity and present a comparison of all analytical results to the Exposure Criteria.
- p. 25, §5.4 Table 4 of this section presents data that were compared to the Rhode Island Residential Direct Contact Exposure Criteria. However, neither the Exposure Criteria nor the comparison of the analytical data to these standards is provided in the report. Please present a comparison of all analytical results to the Exposure Criteria.
- p. 30, §6.6 This section indicates that confirmation samples were taken after excavation of the Building 42 S42-5 sump and contaminated soil. However, the text does not indicate which parameters, if any, exceeded Rhode Island Residential Direct Contact Exposure Criteria. In addition, neither the Exposure Criteria nor the comparison of the analytical data to these standards is provided in the report.

Please discuss the exceedances of the standards and present a comparison of all analytical results to the Exposure Criteria.

In addition, this section indicates that the range of arsenic contamination in the confirmatory samples exceeded Exposure Criteria. Section 6.7 indicates that the site was backfilled with clean soil. Please discuss whether the arsenic concentrations are consistent with background.

p. 32, §7.1 The last paragraph in this section indicates that four samples were collected during trenching activities and were analyzed for VOCs, SVs and TPH and that the data were compared to Rhode Island Residential Direct Contact Exposure Criteria. However, the data for these samples are not presented in this report. In addition, neither the Exposure Criteria nor the comparison of the analytical data to these standards is provided in the report. Please provide the analytical data for the samples collected during this activity and present a comparison of all analytical results to the Exposure Criteria.

p. 33, §7.1 The last paragraph in this section indicates that sample DPSOIL1 was considered a hot spot and that additional removal actions were taken. However, there is no indication that confirmatory sampling was performed after this hot spot removal action. Please explain how it was determined that the hot spot removal was complete.

In addition, this section indicates that all soil was placed back into the excavation (page 32) even though TPH and "several semivolatiles" exceeded Exposure Criteria. Please expand the discussion of possible contamination remaining at this site.

p. 33, §7.2 The last paragraph in this section indicates that a sample of the red soil was collected and analyzed and that the data were compared to Rhode Island Residential Direct Contact Exposure Criteria. However, the data for this sample are not presented in this report. In addition, neither the Exposure Criteria nor the comparison of the analytical data to these standards is provided in the report. Please provide the analytical data for the sample collected during this activity and present a comparison of all analytical results to the Exposure Criteria.

Appendix A Appendix A contains the analytical data reports for the Derecktor Shipyard Berm Removals. The reports contained in this appendix are not numbered nor are they labeled clearly. For example, each sample report contains 3 pages. However, the sample number is included only on the first page. Therefore, the second and third pages of each report could easily be intermixed, causing uncertainty as to which results apply to which samples. In addition, two sets of the reports do not include the section number. Please submit these analytical reports in a more orderly fashion.