



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1
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BOSTON, MASSACHUSETTS 02114-2023

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NAVSTA NEWPORT RI
5090 3a

July 9, 2001

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: Draft Remedial Action Report for Various Removal Actions at the Derecktor Shipyard and Miscellaneous Investigations at Naval Station Newport (NSN) Newport, RI

Dear Mr. Shafer:

EPA reviewed the *Draft Remedial Action Report for Various Removal Actions at the Derecktor Shipyard and Miscellaneous Investigations at Naval Station Newport (NSN) Newport, Rhode Island* dated April 2001 for the incorporation of EPA comments on the previous draft of this document dated September 2000. Owing to the extent of revisions that have been made to the document, a more general technical review was also performed. Detailed comments are provided in Attachment A.

Although the majority of EPA's prior comments have been appropriately addressed, additional revisions are required. Outstanding issues related to earlier EPA comments are presented in Attachment A. New comments are also provided on the extensively revised document.

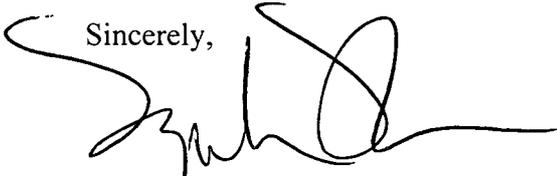
The reporting limits are not shown in any of the summary tables. Has the Navy verified that the reporting limits were below the corresponding Rhode Island DEC? If there were any exceedances, the text should discuss them and their impact on the objectives of the data.

A review of the raw data and the summary tables in the appendices reveals that the summary tables do not seem to list all the parameters analyzed. What criteria had to be met for a parameter to be listed? Please include a discussion of this issue in the text and footnote the tables accordingly.

Some of the summary tables in the appendices do not list Rhode Island DEC for chromium even though there are values available for both trivalent and hexavalent chromium. As a conservative measure, please update the tables to include the Rhode Island DEC for hexavalent chromium.

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,

A handwritten signature in black ink, appearing to read 'Kymbelee Keckler', with a long horizontal flourish extending to the right.

Kymbelee 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

INCORPORATION OF COMMENTS ON SEPTEMBER 2000 VERSION

<u>Page</u>	<u>Comment</u>
p. 21-22, §III.C.3	As requested, the analytical data for the samples collected during the field investigation are included in Appendix F and compared to the appropriate Rhode Island DEC. However, the six locations where the 12 samples were collected on the vegetated mound is not clearly depicted on a figure.
p. 24, §III.C.4	As requested, the Rhode Island DEC have been included in Appendix G and they have been compared to the data for the confirmatory samples associated with the first excavation expansion (<i>i e</i> the second excavation effort). However, the text in this section does not indicate that some of the 14 samples collected during this effort received reduced sets of analyses, as evidenced on the chain of custody provided in Appendix G. Also note that the summary table provided in Appendix G lists metals results as non-detect (<i>i e</i> "-") for samples that were not analyzed for metals. Please clarify and briefly rationalize the differences in the analytical testing performed on the fourteen confirmatory samples associated with this removal effort. Also, please correct the summary table to accurately reflect the analyses performed.
p. 26, Figure 7	As requested, the analytical data for the samples collected during the second excavation expansion (<i>i e</i> the third excavation effort) are included in Appendix F and compared to the appropriate Rhode Island DEC. However, the figure associated with this removal (Figure 7) does not clearly show the locations of additional excavation. In addition, this figure does not show the location of one of the confirmatory samples (B6-S6). Please enhance Figure 7.
p. 33, §III.D.6	The last paragraph on this page should reference §VIII.I, where the Navy briefly discusses arsenic levels in soil and whether they are consistent with background.
p. 38, §III.E.6	Two of the four confirmatory samples collected from the exploratory trenches just north of building 42 showed exceedances for PAHs and TPH. The Navy addressed the area around DPSOIL1 as a hotspot removal apparently because of the exceedance of the Rhode Island Industrial DEC for benzo(a)pyrene. Please explain in the text what

actions were taken to address the exceedances of the Rhode Island Residential DEC for the other PAHs and TPH.

p. 40-41, III.F.2 As requested, the analytical data for the sample collected from the test pit adjacent to MW-09 are included in Appendix P and are compared to the appropriate Rhode Island DEC. The data indicate that the sample showed exceedances of the Rhode Island Residential DEC for manganese and zinc and the Rhode Island Industrial DEC for arsenic. Please explain in the text what actions were taken to address these exceedances.

Appendix E As requested, the Rhode Island DEC have been included in the appendix associated with the confirmatory samples for the initial PCB excavation (Appendix E in this version) and they have been compared to the data for the confirmatory samples. However, the summary table in Appendix E lists a residential DEC value for total chromium that appears to be the sum of the trivalent and hexavalent chromium residential DEC. It is inappropriate to add these values together. Please use the hexavalent value to be conservative.

SPECIFIC COMMENTS

<u>Page</u>	<u>Comment</u>
p. 6, §I.G	The third and fourth bulleted items on this page are identical. Please remove any redundant text.
§III.B.	This section does not have a summary table of exceedances similar to the other sections. While only arsenic exceeded the Rhode Island DEC, the inclusion of an exceedance table would improve consistency.
p. 27, §III.C.4	One of the eight confirmatory samples associated with the third removal at Test Pit 14 (B6-S4) showed exceedances of Rhode Island Residential DEC for PAHs. In the case of benzo(a)pyrene, the Industrial DEC was also exceeded. In addition, all the samples show exceedances of the Rhode Island Industrial DEC for arsenic. The text should describe the action taken to address these exceedances.
p. 27, §III.C.4	The last paragraph in this section indicates that a soil sample was collected on February 22, 1999 from the "eastern wall, southern extent, of the excavation." It is unclear from the text what prompted this sample. The described location seems to indicate that it is not near B6-

S4, which showed DEC exceedances. This paragraph also indicates that "approximately 15 cu-yds of asphalt and soil were removed" from the area of this sample. It is unclear from the text what prompted this removal and whether it took place before the sample collection or after. Please clarify. Also please include a figure showing the locations of the sample and excavated soil.

p. 31, §III.D.6

The last paragraph on this page references Figure 7. The correct reference is Figure 9.

P. 32, §III.D.6

Figure 9 and the text concerning the pipeline exiting the Building 42 sump are somewhat confusing. The text indicates that the pipe exiting the north side of the sump is "N1" and the pipe exiting the west side of the sump is "N2." Figure 9, however, shows samples seemingly more closely associated with "N2" as having names associating them with pipe "N1." Conversely, a label "N2" is used to identify a location near pipe "N1." It is unclear what the significance of this location is and why the designation "N2" was used. Additionally, some pipeline confirmatory samples are identified as "N1-XXX", where "XXX" is a two or three digit number presumably indicating the approximate distance in feet from the sump. Others samples are identified as "N1-Y" where "Y" is a letter. Please provide some clarifying text on the naming system used to identify samples and revise Figure 9 as necessary.

p. 33-34, §III.D.6

The DEC exceedance tables for the confirmation samples associated with the sump removal and pipe removal (Tables 6 and 7 respectively) indicate that two samples had PAH levels above the Rhode Island Residential DEC and that all the samples exceeded the Rhode Island Industrial DEC for arsenic. The first paragraph on page 35 (§III.D.8) states that "the Navy directed the excavated areas to be backfilled." Please elaborate on the decision process involved based on the exceedances.

Appendix E

The summary table in this appendix, as in the other appendices, shows DEC exceedances highlighted in yellow. The result for PCBs in sample TP14W-1 exceeded the corresponding DEC but is not highlighted. Please correct and proof the summary tables to ensure that all the exceedances are highlighted.