



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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May 31, 2005

Curtis Frye  
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: Marine Sediment Sampling and Analysis at the Former Robert E. Derecktor Shipyard

Dear Mr. Frye:

EPA reviewed the *Marine Sediment Sampling and Analysis for Former Robert E. Derecktor Shipyard Naval Station Newport Newport, RI*, dated April 2005 in light of its adherence to the July 2004 *Work Plan, Marine Sediment Sampling for Former Derecktor Shipyard, Naval Station Newport Newport, Rhode Island*. Detailed comments are provided in Attachment A.

The objectives and specific tasks defined in the Work Plan were generally realized in the sampling program. The first objective of determining if changes have occurred in contaminant levels over time was addressed, for the most part, as proposed. Sample locations and analyses match those proposed in the Work Plan with a couple of exceptions, detailed in the report. The report accurately concludes that a number of contaminants still exceed PRGs at some stations but concentrations were notably lower in the 2004 data set than in previously collected data. PAHs still exceeded PRGs at DSY-03 and DSY-29 but concentrations were lower than in previous samples. PCBs still exceeded the PRG at DSY-27 and were only slight lower than in the 1995 sample. At DSY-103, PAHs exceeded PRG in the 0.5 to 1-foot interval but not in the 0 to 0.5-foot interval. Finally, copper and zinc at DSY-103 and DSY-104 exceeded PRGs but concentrations were lower in the 0-0.5-foot interval than in the deeper 0.5 to 1-foot interval.

The report recognizes that three samples were not collected as proposed in the work plan. While a replacement location was selected for the reference sample DSYJPC-02, no replacement locations were selected for the other two locations. The Work Plan rationale for targeting DSY-07 was "Near stormwater outfall." The rationale for DSY-102 was "end of Pier 2." The importance of these proposed locations should be reviewed to determine if the lack of a sample at the locations constitutes an important data gap.

A couple other samples were collected in locations that, while in the general area proposed, do not match those shown in the Work Plan. Sample DSY104 was collected northwest of DSY02, although the proposed location was southeast of DSY02. In addition, DSY103 was collected just north of Pier 1, near the shore. The proposed location was further from shore. While these

apparently minor shifts in sample locations may still meet the data requirements, the changes should be discussed in the report along with an assessment of any unmet data needs.

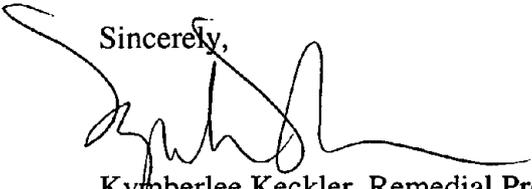
Turbidity data appear to have been collected as proposed in the Work Plan. The results suggest that ship movements disturbed sediments, particularly at Pier 2, but other factors did also, as evidenced by high turbidity readings measured during times with no ship movements. The results are accurately summarized but the report does not present information that allows a review of the quality of the data; notes on maintenance and calibration of the instruments are not evident in the report. In future documents, please provide documentation of any maintenance (cleaning and debris removal) and calibration activities during the monitoring period.

The data validation reports for inorganics include a general endorsement that the data are considered acceptable for use as qualified despite some of the problems discussed. The organics data validation reports do not include such an endorsement. Many of the organics results indicate some data quality problems. These should be further evaluated. For example, the report for SDG C1041 (page 207 of 1348 as numbered by AdobeReader) indicates that problems with Preservation and Technical Holding Times may bias results low and that low recoveries of Internal Standards may bias results low. These data quality issues should be reviewed by a data validator.

Data are presented in Appendix C for many more metals than are shown in Table 4-1. Because the data have been collected and are available, they should be reviewed and presented to ensure that no significant hits were found for some of the metals that may not be the focus of the current investigation.

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

Sincerely,



Kymberlee Keckler, Remedial Project Manager  
Federal Facilities Superfund Section

Attachment

cc: Paul Kulpa, RIDEM, Providence, RI  
Cornelia Mueller, NETC, Newport, RI  
Bart Hoskins, USEPA, Boston, MA  
Chau Vu, USEPA, Boston, MA  
Jennifer Stump, Gannet Fleming, Harrisburg, PA

Ken Finkelstein, NOAA, Boston, MA  
Steven Parker, Tetra Tech-NUS, Wilmington, MA

## ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. 3-6. §3.1	The text at the top of the page stated that "...All stations that had previous sample data were located to within three meters of the former target coordinates using the dGPS...." The GPS data in Appendix B indicate that sample locations were generally within three meters of the previous sample locations. One exception was DSY-08, which appears to be a little more than 3 meters away from the proposed location. This shift should be recognized in the text.
Appendix E	The first paragraph of Section 3.1 states that surface sediment samples were collected using a petite ponar, Smith-MacIntyre grab sampler, or equivalent sampling technique. As indicated in Section 3.1 of the main text of the report, a petite ponar was used for surficial sediments. No other methods were specified. Please correct the text in the appendix to clarify that no other methods were used.