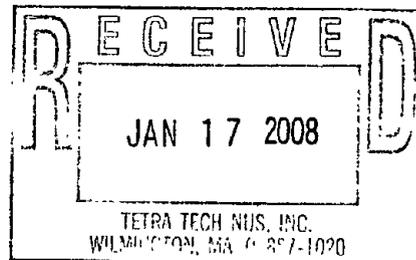




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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5090 3a



January 15, 2008

James L. Colter, P.E.  
Remedial Project Manger  
Department of the Navy  
Naval Facilities Engineering Command, Mid-Atlantic  
9742 Maryland Avenue  
Norfolk, VA 23511-3095

Re: Draft Removal Action Completion Report for Melville Water Tower Site  
Naval Station, Newport, Rhode Island

Dear Mr. Colter:

EPA has reviewed the "Draft Removal Action Completion Report: Soil Removal Actions, Melville Water Tower, NAVSTA, Newport, Rhode Island," dated November 2007. The objective of the removal action was to remove and dispose of subsurface structures and soil contaminated with lead-based paint at the Melville Water Tower site. The document was prepared by Tetra Tech NUS, Inc. for the Department of the Navy, Naval Facilities Engineering Command Mid-Atlantic. EPA reviewed the report to assess conformance with the "Work Plan for Removal Action," dated August 2007, and the Action Memorandum, dated July 23, 2007.

Enclosed are our comments on the Draft Report. The majority of the comments request clarification regarding waste characterization data and confirmation data, to ensure that there are clear lines of evidence (1) linking sample locations of excavated material to waste characterization data and documentation of disposal and (2) linking sampling locations for soils that remain at the site to confirmation data.

If you have any questions regarding the enclosed comments, please contact me at (617) 918-1754 or at [lombardo.ginny@epa.gov](mailto:lombardo.ginny@epa.gov).

Sincerely,

Ginny Lombardo  
Remedial Project Manager

cc: Paul Kulpa, RIDEM  
Paula Loht, Gannett Fleming  
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Stephen Parker, TtNUS

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**EPA Comments on  
Draft Removal Action Completion Report: Soil Removal Actions  
Melville Water Tower  
NAVSTA, Newport, Rhode Island  
November 2007**

**GENERAL COMMENTS:**

1. The text requires clarification because there are 2 Appendices labeled A and B, as the Report's Appendix A has, within it, an Appendix A and B. Please clarify contents of Appendices A and B to eliminate contradictions.
2. It is difficult to correlate the confirmation samples that were collected to the appropriate analytical results within Table 3-1, the data provided in Appendices, and the figures provided.

Area A: Figure 3-1 represents the Area A sample locations from 0-2 feet. Please clarify that these are the Area A pre-characterization sampling locations that were the basis for excavation of this area and disposal of the material as hazardous waste. Section 3.1 explains the procedure for collecting confirmation samples. However, the location and number of confirmation samples for Area A is not clear following review of the supporting information. Table 3-1, "Remaining Soil Concentrations after Removal Action," contains only five sidewall sample results for Area A. Data included in Appendix B of Appendix A includes sample results for 15 locations within Area A and 1 duplicate (See Chain of Custody dated 7/27/07, MWTA 11320 – MWTA 11340B). There is also a Chain of Custody dated 8/2/07 for 14 Area A samples (MWTA7360S – MWTA11350B) for which no data are provided in the Appendix. In addition, Section 2.2.2 indicates that: "The southern portion of Area A did not require additional excavation to three feet as soil concentrations were below...150 mg/kg lead." The data demonstrating that the southern portion of Area A was below 150 mg/kg lead should be included as in Table 3-1 and copies should be included in the appropriate Appendix.

Areas B, C and D: Figure 3-2 represents sample locations for Areas B, C and D. Please clarify that these are the soil characterization sampling locations that led to the excavation of this material, not the location of confirmation samples. Clearly, Table 3-1 includes many more sample points for Areas B, C, and D than located in Figure 3-2 or than data provided in Appendix B of Appendix A. [For example, for Area D, Table 3-1 includes over 150 sample locations, Appendix B of Appendix A includes data for 52 sample locations, and Figure 3-2 includes 147 sample locations. Appendix B of Appendix A also includes a Chain of Custody dated 8/8/07 with additional Area D locations, but no corresponding data is included in the Appendix.]

Because confirmation sampling included sidewall sampling, allowed for compositing, and Area C overlapped portions of Areas A and B, it may be difficult to depict the locations of confirmation samples in a figure. However, please provide clarification in the report

regarding the sample locations (characterization versus confirmation) presented in Figures 3-1 and 3-2, those listed in Table 3-1, and the data provided in the Appendices.

3. The Final Work Plan for the Removal Action (August 2007), Section 7.0, Page 7-1, 2<sup>nd</sup> bullet, states: "The remediation subcontractor will establish a system for tracking soil stockpiles and associated sample results." Please provide necessary information to correlate Tank Farm 5 individual soil stockpiles with associated sample results and manifests or bills of lading.
4. The Final Work Plan for the Removal Action (August 2007), Section 10.0, Page 10-1, states: "The closure report will contain confirmation and waste characterization analytical results." See General Comment 2. Please confirm that all waste characterization and confirmation analytical data are included in the Report, located in separate appendices, and please provide a "key" to correlate sample locations to analytical data and to either waste manifests/bills of lading or as confirmation of soil that remained at the site. If characterization data is included in a previous report (e.g., Area A pre-characterization data), please provide a reference to the report where the complete data set can be found.

#### **SPECIFIC COMMENTS:**

1. Section 1.0, Page 1.0: The Action Memo referenced in the last paragraph of this section is the draft. Please reference the Final Action Memo, dated July 23, 2007.
2. Section 1.3, Page 1.2.2: This section indicates that "confirmation results from samples collected by the removal action subcontractor...are provided in Appendix A." Appendix A, Section 1, page 3, Introduction, indicates rather that "copies of analytical reports from characterization of materials in the Storage Area" are included in the Appendix. See General Comments 2 and 4. Please clarify the location of both waste characterization data and confirmation data.
3. Section 1.2.2, Page 1-3: This section indicates that: "Analytical results from split samples collected by Tetra Tech NUS, Inc. are provided in Appendix B." Section 3.1 indicates that "TtNUS collected split samples for confirmation at a rate of 1 in 20." Please clarify that the data in the tabbed Appendix B is the confirmation split samples. The sample nomenclature and origin are not specified. Please explain how the splits can be linked to the related subcontractor's confirmation data. Also, provide an analysis on whether the results of split samples correlated adequately with the sub-contractor's results.
4. Section 2.2.2, Page 2-3: The second paragraph erroneously states that the RCRA C criteria is 150 mg/kg lead. Consider using "Action Level" or "RI DEM standard" in place of "RCRA C criteria."
5. Section 2.3.1, Page 2-4: The last sentence of the first paragraph should be revised to indicate that: "Materials were *not* brought on site until test results were approved by TtNUS."

6. Section 3.1, Page 3-1: The second paragraph text states that each confirmation sample was taken as a minimum three point composite. Area A's confirmation sample identification numbers (MTWA 11320, 11340, etc.) on the chain of custody records dated 7/27/07 are marked as grab samples [within the Appendix B section of Appendix A]. Please explain how the confirmation samples were collected and correct the text accordingly.
7. Section 3.2, Page 3-3: The text states that: "Global Remediation generated waste profiles of the materials for disposal facilities based on laboratory analytical data." See General Comment 4 above regarding confirmation that waste characterization data is included in the Appendices and correlated with waste manifests. Consider including waste profile copies within Appendices and correlating waste profiles with analytical data and waste manifests/bills of lading.
8. Section 3.3, Page 3-4: The text refers to Appendix A for sample results certifying that clean backfill soils were brought to the site. These sample results were not found in Appendix A.
9. Appendix A, Page 3, Section 1: The Introduction, 5<sup>th</sup> bullet, indicates: "Copies of the Manifests/bills of lading, and certified weight slips as described above" are provided. This should include bills of lading for the resized foundations and footings concrete, recycled at J.A.M. Materials in Middletown, Rhode Island. It appears that backfill material (sandy gravel) load slip copies from J.A.M. Materials have been provided. However, bill of lading(s) totaling resized foundations and footings concrete quantities, recycled at this facility, were not provided in the Appendix.
10. Appendix A, Page 5, Section 2.1: In the summary table of waste removed, please include concrete quantities for resized foundations and footings, recycled at J.A.M. Materials.
11. Appendix B of Appendix A: In addition to the missing data referenced in General Comment 2, lead analytical results for the chain of custody records dated 7/30/07 and 7/31/07 (sample numbers MWTD 22000B-MWTD 18090B) were not provided. In addition, no metals data was provided for the chain of custody records dated 8/2/07, samples MWTB1000S – MWTB0000B, or for the chain of custody records dated 8/8/07.