Part 2 – Technical Presentation

Naval Station Newport

Site 13 Time Critical Removal Action
Update: September 18, 2024

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Technical Presentation: Site 13 - Tank Farm 5 Update

Restoration Advisory Board Meeting September 18, 2024

- Review of Tank Farm 5
- Review of the need for a Time Critical Removal Action (TCRA)
- Update on the activity
- Materials removed from the Site
- Next steps for completion of the action

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Review of Tank Farm 5:

- Former petroleum storage and distribution facility located in Middletown.
- Identified as Site 13 Operable Unit 2 at the Naval Education and Training Center (NETC) (Naval Station (NAVSTA) Newport) Superfund Site.
- Tanks were decommissioned and closed in place in the 1990s.
- December 2013 Record of Decision for DU5-1 in northwestern portion of site.
- Remedy consisted of a soil cover, long term monitoring of groundwater and land use controls.

Other pertinent activity:

- Support area for closure of the McAllister Point Landfill 2000-2004
- Excess soil from MILCON projects stockpiled at Tank Farm 5 in the 2000s.
- Remaining stockpiled soils were evaluated for arsenic in 2012.
- Perimeter fence was removed in 2018 as a maintenance action.
- Evaluated as a candidate location for solar development.
- Fence replaced in 2021 to restrict access to the stockpiles (*TCRA*) .

Conditions and Need for a TCRA

- Soil piles were recognized following the proposal to redevelop Tank Farm 5 as a solar generating facility.
- Stockpiles estimated at ~29,000 cubic yards.
- Mostly made up of soil, sand, gravel, and stone.
- Also contains concrete, brick, asphalt and pieces of building debris.
- Small amounts of suspected asbestos-containing building debris (floor tile, shingles).

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Navy initiated the Time Critical Removal Action to remove the stockpiles & dispose at appropriate landfills in 2024.

- **"Time-Critical" actions are given a planning period of less than six months**
- **A TCRA is a removal measure that can be taken by the Navy as long it does not worsen the condition or obstruct a future remedial action.**
- **"Action Memorandum" was completed and signed in October 2023.**
- **Public notice was made in four publications between December 30, 2023 and January 4, 2024**
- **RAB was briefed on March 20, 2024**

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Progress update:

- ✓Developed Removal Action Work Plan (RAWP), December 6, 2023
- ✓ Mobilized, cleared site, installed erosion controls, surveyed soil piles and completed site setup. Aug 10, 2023 - Feb 21, 2024
- ✓ Collected and Analyzed Samples from Soil Piles for Waste Characterization Purposes, Dec 4, 2023 – Jan 10, 2024
- ✓Discovered four additional small piles and added them to the action plan (May 2024).
  - ➢Plan to remove these piles in September

Waste Characterization Samples (previously presented)

- All material was classified as asbestos containing waste.
- All material was non-TSCA (PCBs < 1 mg/kg)
- Most piles had detections of PFAS (Per- and Polyflouroalkyl substances) (non-detect to 5 ug/kg) – below the EPA RSLs.
- Arsenic concentrations in the soil piles ranged from 5.7 mg/kg to 53 mg/kg
- All but one sample were below the regulatory levels for TCLP analysis:
  - 2,4-DNT was found slightly above the regulatory level (0.22 mg/L vs. 0.13 mg/L).
  - 2,4-DNT has been used in explosives and other materials.
- No new contaminant sources found during excavation

Preparing composite waste characterization samples

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Transportation

- Intermodal containers and dump trailers were lined before loading
- One excavator was used to dig material from the soil pile and a second excavator is used to load material into the lined intermodal containers or dump trailers
- GPS was used to guide the digging excavator to meet planned elevations

Dust Suppression/Air Monitoring

- During soil loadout and excavation activities, a water truck was used to keep soil moist and suppress dust.
- During soil loadout and excavation activities, downwind perimeter air monitoring was performed.
- One perimeter asbestos air sample hit the action level based on Phase Contrast Microscopy (PCM) analysis. Transmission Electron Microscopy (TEM) analysis of the sample indicated that the fibers detected were not asbestos fibers.
- No dust action levels were exceeded.

Transportation of Material Excavated from Soil Piles

- After loading, trucks travelled to the truck decontamination area.
- After decontamination, liners in Intermodal containers and dump trailers were sealed, tarps were then placed over containers and dump trailers.
- Manifests were completed and checked prior to trucks leaving the site.
- Trucks were checked for required placards (UN3077, Environmentally Hazardous Substances).

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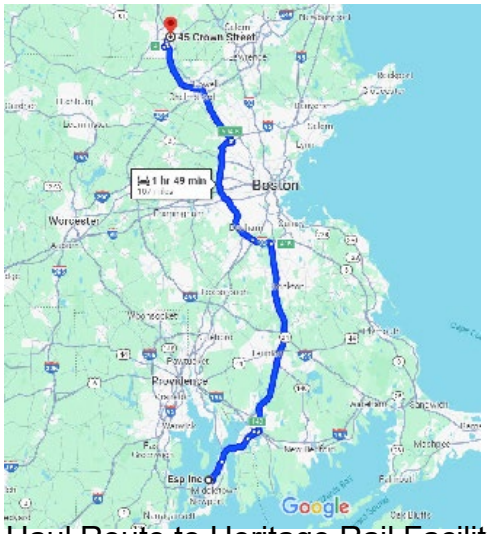
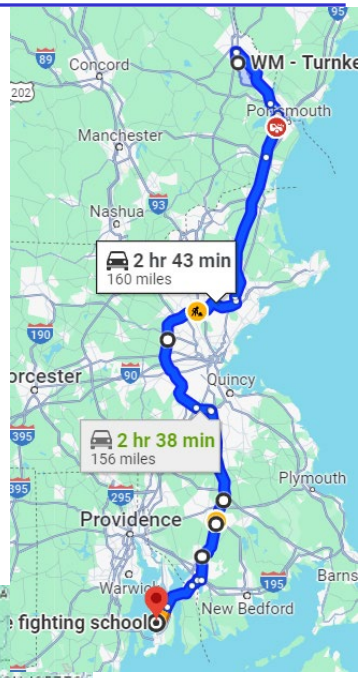
Haul Routes

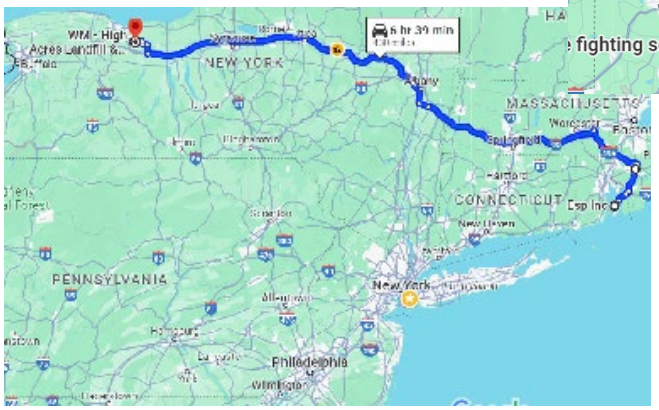
- Trucks leave the site and proceed north on Burma Rd, make a right hand turn on Greene Lane and left on Rte 114 heading north.
  - Loaded intermodal containers were offloaded in a rail transload facility located in Nashua, NH and loaded onto railcars
  - Material was hauled to the High Acres landfill in Fairport, NY and the Turnkey landfill in Rochester, NH in dump trailers.



Haul Route to Heritage Rail Facility



Haul Route to Turnkey Landfill



Haul Route to High Acres Landfill

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Progress update continued

- ✓Excavation, Transportation and Disposal of Soil Piles
  - ✓17,978 Tons of material sent to Heritage Environmental Services RCRA Subtitle C landfill in Roachdale, IN
  - ✓18,225 Tons of material sent to High Acres RCRA Subtitle D landfill in Fairport, NY
  - ✓14,455 Tons of material sent to Turnkey Subtitle D landfill in Rochester, NH
- ✓Total to date = 50,658 tons (as of Friday 9/6)

- ➢Approximately 100 tons still to be removed.

Progress update continued

- Excavation continues to a pre-determined elevation based on older site records
  - Age of these records provides uncertainty on the stopping point.
  - Follow up investigations will be necessary to identify remaining material (not part of the TCRA).
- Total of material removed approximately 50,660 tons
  - Early estimate from Action Memorandum = 30,000 tons
- Total updated cost estimate = $19 M
  - Cost estimate from Action Memorandum = $12 M

Next Steps:
Completion of This Action

- Post-excavation inspections are being conducted to document existing conditions.
  - Inspection by licensed asbestos inspectors
  - Inspection by agency representatives
- Land surveys are being completed to document resulting ground elevations.
- Soil will be covered with erosion control matting to reduce erosion and promote growth of vegetation.
- Contractors will demobilize equipment, temporary facilities and personnel.
- Navy will prepare a Removal Action Completion Report (RACR) to document actions taken to implement the TCRA.

Next Steps:
Determine need for further long-term actions

- Post-removal site characterization sampling will be performed under a Remedial Investigation (RI) Work Plan
  - Surface soil sampling (plan in development).
  - Groundwater evaluations (under way) may be augmented with additional investigation work.
- Navy will follow the CERCLA process to select a remedy for any residual contaminants found during the RI that pose risk to receptors.

- The team is currently discussing options to address any remaining soil and debris at the site beyond the identified baseline elevation (presumed to be from the original piles) which will likely encompass both additional investigation and excavation.

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