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LETTER AND COMMENTS FROM U S EPA REGION 1 REGARDING DRAFT FINAL STUDY
AREA SCREENING EVALUATION TANK FARM 3 NS NEWPORT RI
10/18/2011
U S EPA REGION 1



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION I

5 Post Office Square, Suite 100
Boston, MA 02109-3912

October 18, 2011

Mr. Roberto Pagtalunan
NAVFAC MIDLANT (Code OPNEEV)
Environmental Restoration
Building Z-144, Room 109
9742 Maryland Avenue
Norfolk, VA 23511-3095

Re: Draft Final Study Area Screening Evaluation for Tank Farm 3

Dear Mr. Pagtalunan:

Thank you for the opportunity to review the *Draft Final Study Area Screening Evaluation for Tank Farm 3* dated September 2011 (referred to as the SASE). The SASE documents the investigations that were conducted to determine if contaminants are present at concentrations exceeding the CERCLA risk-based screening standards so that decisions can be made about the need for further investigations to characterize site-specific risk. Detailed comments are provided in Attachment A.

Except for not including oil-water separator #4 in the list of other possible sources (*see* response to SC10 submitted January 13, 2011), the Navy incorporated its responses into the Draft Final SASE and addressed EPA's earlier comments.

I look forward to working with you and the Rhode Island Department of Environmental Management toward the cleanup of Tank Farm 3. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kimberlee Keckler".

Kimberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: Gary Jablonski, RIDEM, Providence, RI
Deb Moore, NETC, Newport, RI
Steven Parker, Tetra Tech-NUS, Wilmington, MA

ATTACHMENT A

<u>Page</u>	<u>Comment</u>
§4.2	The EPA Regional Screening Levels are updated twice a year to reflect changes in toxicity values. The latest RSLs were published in May 2011. Please revise the May 2010 RSLs referenced in this section and Tables 4-1 through 4-4 to the May 2011 RSLs and determine whether this will change the screening. For further investigation and human health risk evaluation for AOC 001, AOC-020, and Building 227, site chemical concentrations need to be screened against the most recent risk-based screening levels.
p. 4-5, §4.3	In the first sentence under AOC 004, remove the parenthetical phrase and insert the number of samples if known.
p. 6-4, §6.2.2	In the last sentence, please correct the reference to 4.3 because 4.3.1 does not exist.
§6.2.4	Future resident receptors and trespassers should be evaluated.
p. 6-9, §6.3.2	Please explain how the Navy intends to address the AOCs that do not have contaminant exceedances of the industrial direct exposure criteria (DEC) but do have exceedances of the residential DEC. Many more areas than those identified for further investigation in this draft final SASE were identified in the draft SASE as exceeding the residential screening levels.
p. 6-9, §6.3.3	Please add oil-water separator 4 to the discussion. The Navy indicated that it is not sure that this structure ever existed; although reference was found in one document stating that oil-water separator 3 was connected to oil-water separator 4. Please conduct a geophysical search for this structure to verify whether it exists in the general area where depicted in drawings.