

N62661.AR.002627
NS NEWPORT
5090.3a

EMAIL REGARDING U S EPA REGION I COMMENTS ON DRAFT FINAL TECHNICAL
MEMORANDUM FOR SUPPLEMENTAL REMEDIAL INVESTIGATION NETC NEWPORT RI
6/15/2011
U S EPA REGION I

Ropp, Jim

From: Lombardo.Ginny@epamail.epa.gov
Sent: Wednesday, June 15, 2011 3:47 PM
To: maritza.montegross@navy.mil
Cc: Ropp, Jim; gary.jablonski@DEM.RI.GOV; Parker, Stephen; deborah.j.moore@navy.mil; steinberg@mabbett.com; kemp@mabbett.com; Kenneth_Munney@fws.gov; Hoskins.Bart@epamail.epa.gov; Vu.Chau@epamail.epa.gov
Subject: NUSC Draft Final Supplemental RI - May 2011
Categories: Newport

Maritza-

A couple of minor comments on the Draft Final Supplemental RI Report:

- In response to EPA Specific Comment #22, text was added in Section 6.5 to include a qualitative discussion of the background risk associated with B(a)P and arsenic in sediment. Please add a concluding sentence indicating that since the ILCRs from arsenic and B(a)P in sediment at the site are similar to background ILCRs from these compounds, it is reasonable to eliminate arsenic and B(a)P as sediment COCs.

- Table 4-10: This table lists benzo(b)fluoranthene but should apparently list benzo(k)fluoranthene. See Navy's response to EPA Specific Comment #20 for the Draft SRI. The same comment applies to Table 6-6.

And to clarify EPA's position on next steps on addressing ecological risks:

1. There appears to be a significant lead source to the on-site stream, which may reflect leaching from contaminated soil adjacent to the stream. The stream itself flows over exposed rock for much of its length, and contains little soft sediments, so it is possible that sediment remediation will not be practicable. EPA expects that that, in the FS, the Navy will consider the potential for lead to be carried through the stream to the pond with potential adverse effects, and address the underlying source areas that are creating this potential hazard in the stream. This risk is not explicitly described in the RI documents, although lead has been retained as a COC in both stream and pond sediments.

2. It is EPA's understanding that as we move into the FS stage, the finalizing of PRGs and evaluation of appropriate remedial actions will be based on the observed toxicity in all three pond samples, and lack of toxicity in the reference area. It is important to note that, historically, toxic sediments have been the primary driver of site clean-up actions related to ecological risk at Navy sites in Region I.

With no non-toxic site samples available, it is recommended that, in the FS, the Navy develop PRGs based on a geometric mean of reference (as the NOEC) and lowest on-site (as the LOEC) sediment concentrations for each COC, as well as with a cumulative approach using PEC Quotients.

Please let me know if Navy will submit replacement pages to address the minor comments above, In addition, confirm that Navy concurs with the next steps on ecological risks. EPA understands that the eco risk next steps will be addressed in the FS and there does not need to be changes to the SRI to address these comments. Upon receipt of the replacement pages, EPA will concur with the SRI.

Finally, please update us on the status of the revised Draft FS for NUSC. Thanks.

Ginny Lombardo
Remedial Project Manager
U.S. EPA Region I
Federal Facilities Superfund Section
5 Post Office Square
Suite 100 (OSRR 07-3)
Boston, MA 02109-3912
(617) 918-1754
(617) 918-0754 (fax)
lombardo.ginny@epa.gov