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U S NAVY RESPONSES TO RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL  
MANAGEMENT COMMENTS DATED 30 MAY 2012 TO DRAFT FINAL ENGINEERING  
EVALUATION/COST ANALYSIS AUGUST 2011 MUNITIONS RESPONSE PROGRAM SITE 1  
(MRP01) NS NEWPORT RI  
5/30/2012  
U S NAVY

**NAVY RESPONSES TO  
U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA)  
COMMENTS DATED MAY 30, 2012  
ON THE DRAFT FINAL ENGINEERING EVALUATION/COST ANALYSIS (AUGUST 2011)  
FOR THE MRP SITE 01, CARR POINT RECREATIONAL VEHICLE CAMPING PARK AREA  
NAVAL STATION NEWPORT  
NEWPORT, RHODE ISLAND**

Navy responses to U.S. Environmental Protection Agency (EPA) comments on the Navy's Draft Final Engineering Evaluation/Cost Analysis (EE/CA) for the MRP Site 01, Carr Point Recreational Vehicle Camping Park Area are presented below. The EPA comments are presented first (in italics) followed by the Navy's comments.

**General Comment:**

*EPA, Navy and RIDEM participated on a conference call on May 22, 2012 to discuss the Draft Final EE/CA. The purpose of the call was to discuss a proposal that EPA had issued via email to Navy and RIDEM following our preliminary review of the Draft Final EE/CA. EPA requested that Navy consider comparing confirmatory sampling data to the RIDEM individual Industrial/Commercial DEC standards for all identified COCs (PAHs and metals) and use that comparison to make decisions regarding additional removal, rather than the benzo(a)pyrene (B(a)P) equivalent criteria that was proposed in the Draft Final EE/CA. During the call, Navy agreed to this approach. Accordingly, the Draft Final EE/CA must be revised throughout to reflect this approach. In this way, the area to be addressed by this removal action will then be adequately addressed with respect to soil contamination once we get to the remedial phase.*

**Response:** Navy agrees to make revisions to the Draft Final EE/CA as discussed on the May 22, 2012 conference call and resubmit a redline electronic copy for review. A conference call can then be scheduled to discuss further comments. Navy would prefer not to submit a Revised Draft Final EE/CA in order to save time on the review process and to continue on schedule for the proposed removal action.

**Specific Comments:**

*Comment 1: Page ES-2 and Page 3-2, 1<sup>st</sup> Bullet: Revise the RAO on page ES-2 to reference "co-located metals contamination" consistent with the RAO listed on page 3-2. Delete the term "former" in both statements.*

**Response:** The text on page ES-2 and page 3-2 will be revised as suggested in the comment.

*Comment 2: Page 3-2, Section 3.3, and Page 4-4, Section 4.5: In these sections, it is noted that "a subset of the confirmatory samples will also be analyzed for metals..." or "(a) select number of the confirmatory soil samples would also be analyzed for metals..." Why is the metals analysis only proposed for a subset of the confirmatory samples? What is the basis for the selection of the samples that will include metals analysis?*

**Response:** Navy will revise the document to state that all confirmatory samples will be analyzed for metals. The cost table 4-2 has included these extra analytical costs.

*Comment 3: Page 4-6, Section 4.5.3, and Table 4-2: The cost of this alternative decreased from that included in the Draft EE/CA. According to Table 4-2, the primary reason for this decrease is that transportation and disposal costs were excluded from the calculation of indirect costs and the contingency was modified to 10% from 20%. Please clarify these cost revisions..*

**Response:** The costs were revised to reflect more current cost assumptions used at similar sites. The contingency was modified from 20% to 10% based on the relatively small proposed excavation area, shallow excavation depth, and apparent lack of complex site features at the RVCP area, that would be expected to impede excavation.

Comment 4: Figure 2-2: Consider adding the former firing arcs to this figure for clarification.

**Response:** Figure 2-2 will be revised to include the former firing arcs.

Comment 5: Appendix A:

a. Since the Navy will not use the B(a)P equivalent approach, but will calculate separate individual PRGs for PAHs, the calculations in Appendix A need to be revised for the RBCs and Table A-1 needs to be revised to show individual remediation goals for PAHs.

b. The ADAFs only apply to mutagenic carcinogens, which in this case are the carcinogenic PAHs. They do not apply to non-carcinogens and arsenic. The equations showing intake for oral, dermal, and air with ADAFs should follow the equation for mutagenic carcinogens, not the non-carcinogens equation. Please revise.

c. The inhalation unit risk for dibenzo(a,h)anthracene is  $1.2E-03$  ( $\mu\text{g}/\text{m}^3$ )-1, not  $1.1E-03$  as in the table. Please revise.

**Response:**

a. The PRG calculation spreadsheets previously presented and continue to present PRGs for the individual carcinogenic PAHs. The PRGs for the individual carcinogenic PAHs, arsenic, chromium, and lead are now listed in an in-text table. Table A-1 is now included for informational purposes only.

b./c. Agree. The referenced spreadsheets have been revised.