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LETTER AND U S EPA REGION I COMMENTS ON DRAFT FINAL ENGINEERING  
EVALUATION/COST ANALYSIS FOR MUNITIONS REPOSE PROGRAM SITE 1 CARR  
POINT RECREATIONAL VEHICLE CAMPING PARK AREA NS NEWPORT RI  
5/30/2012  
U S EPA REGION I



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 1  
5 POST OFFICE SQUARE, SUITE 100  
BOSTON, MASSACHUSETTS 02109-3912

May 30, 2012

Maritza L. Montegross  
Remedial Project Manager  
NAVFAC MIDLANT, Code OPNEEV  
9742 Maryland Avenue, Bldg. Z-144  
Norfolk, VA 23511-3095

Re: Draft Final Engineering Evaluation/Cost Analysis for  
MRP Site 01, Carr Point  
Recreational Vehicle Camping Park Area  
NAVSTA Newport, RI  
May 2012

Dear Ms. Montegross:

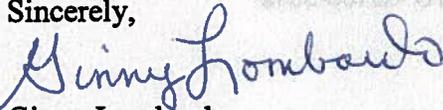
EPA has completed its review of the "Draft Final Engineering Evaluation/Cost Analysis for MRP Site 01, Carr Point Recreational Vehicle Camping Park Area, NAVSTA Newport, RI," dated May 2012, as prepared by Tetra Tech NUS, Inc., on behalf of Naval Station Newport, RI. The Draft Final EE/CA presents removal action alternatives to mitigate potential human health risk associated with PAH contaminated soil; prevent the off-site migration of contamination; and restrict the use of the site for limited recreation only. The document was reviewed for completeness, technical accuracy, and consistency and to ensure that EPA comments on the draft had been adequately addressed. General and specific comments on the document are attached.

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 using the RIDEM individual Industrial/Commercial DEC standards for all identified COCs (PAHs and metals) for the removal action cleanup goals, 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 Navy must revised and resubmit the Draft Final EE/CA to reflect this approach.

In addition, this change in approach will require revision to the Draft Action Memorandum submitted by the Navy on May 15, 2012. Please also revised and resubmit the Draft Action Memorandum to reflect the agreed upon approach.

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

Sincerely,



Ginny Lombardo  
Remedial Project Manager

**Attachment**

- cc: Pamela Crump, RI DEM  
Darlene Ward, NAVSTA Newport  
Thomas Campbell, TtNUS  
Stephen Parker, TtNUS  
Ken Munney, USF&W  
Chau Vu, EPA  
Bart Hoskins, EPA  
David Peterson, EPA  
Greg Kemp, Mabbett & Associates, Inc.

**EPA Comments on  
Draft Final Engineering Evaluation/Cost Analysis for  
MRP Site 01, Carr Point  
Recreational Vehicle Camping Park Area  
May 2012**

**General Comment:**

1. 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.

**Specific Comments:**

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.
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?
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.
4. Figure 2-2: Consider adding the former firing arcs to this figure for clarification.
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  $1.2E-03$  (ug/m<sup>3</sup>)-1, not  $1.1E-03$  as in the table. Please revise.