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TRANSMITTAL LETTER AND U S EPA REGION I COMMENTS ON THE DRAFT PROPOSED REMEDIAL ACTION PLAN FOR OPERABLE UNIT 6 (OU 6) SITE 17 FORMER BUILDING 32 GOULD ISLAND NS NEWPORT RI
5/20/2013
U S EPA REGION I

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION I
5 Post Office Square, Suite 100
Boston, MA 02109-3912

May 20, 2013

Ms. Maritza Montegross
NAVFAC MIDLANT (Code OPNEEV)
Environmental Restoration
Building Z-144, Room 109
9742 Maryland Avenue
Norfolk, VA 23511-3095

Re: Draft Proposed Remedial Action Plan for Site 17, Former Building 32 Gould Island, Operable Unit 6

Dear Ms. Montegross:

Thank you for the opportunity to review the Draft Proposed Remedial Action Plan for Site 17, Former Building 32 Gould Island, in Jamestown, Rhode Island, dated April 29, 2013 (PRAP). The PRAP presents the proposed cleanup approach and public meeting details for Site 17, Gould Island. EPA reviewed the document in light of EPA's *A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents*.
Detailed comments are provided in Attachment A.

Please include "Operable unit 6" in the title of the Proposed Plan.

I look forward to working with you and the Rhode Island Department of Environmental Management toward the cleanup of the Gould Island. Please do not hesitate to contact me at (617) 918-1385 should you have any questions or wish to arrange a meeting.

Sincerely,

Kymberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: Pam Crump, RIDEM, Providence, RI
Deb Moore, NETC, Newport, RI
Ken Finkelstein, NOAA, Boston, MA
Steven Parker, Tetra Tech-NUS, Wilmington, MA

ATTACHMENT A

Page	Comment
p. 1	In the right box, please insert the public meeting and hearing date where it is currently shown highlighted as "Month Day."
p. 2	In the first paragraph, change "hazardous materials have caused impact to the environment" to hazardous materials pose a risk to human health and the environment."
p. 2	In the first paragraph in the second column, end the sentence after "Site 17."
p. 5	Under History of Site Investigations, please mention the asbestos abatement and the RCRA enforcement action that resulted in removal of hazardous materials. In the 2002 summary, capitalize "Toxic Substances Control Act."
p. 5, right column	Please change the first sentence below the box to "…evaluated during the RI were used in the human health risk assessment (HHRA) and the ecological risk assessment (ERA)…." Please change the first sentence in Step 1 to "…at concentrations that exceeded federal or state risk-based screening levels, where applicable." Under Summary of Risks, please add the following: *"It is the Navy's current judgment that the Preferred Alternative identified in this Proposed Plan, or one of the other active measures considered in the Proposed Plan, is necessary to protect public health or welfare or the environment from actual or threatened releases of pollutants or contaminants from this site that may present an imminent and substantial endangerment to public health or welfare."*
p. 7	In the Human Health Risk section, add a table that presents the outcome of the risk assessment for each receptor. Include a table for the summary of RME human health risks that require action and a table of cleanup goals for soil, groundwater, and sediment.
p. 7, left column	Please add a bullet for the human health risk conclusions to include exposure to soil by current and future workers (PAHs and metals).
p.7, right column	Replace the first sentence with: "The problem formulation step identifies the contaminants present, and the ecological receptors (animals) potentially exposed to those contaminants." In the text box, replace the second sentence with : "Hazard quotients are calculated by dividing the exposure of receptors to contaminants, through food or direct contact, with concentrations considered to pose little or no risk of adverse effects."

p. 8, left column

Under the Baseline Ecological Risk Assessment, replace the second sentence with: "The toxicity testing involves laboratory exposure of amphipods (shrimp-like crustaceans) to sediment samples from different areas of the site and measurement of survival and reproduction rates."

Bullets: Please check the proposed plan for consistent use of COC vs. COPC. Change the last bullet to: "Sediment – PCBs, PAHs, metals were identified as likely sources of toxicity. Cleanup goals were developed for PCBs and PAHs based on dose-responses in toxicity tests. An additional cleanup goal was calculated for a combination of chemicals based on their individual benchmarks (Effects Range Median or ERM values) and observed toxicity. This calculated value is called an ERM quotient."

p. 8, right column

Please insert bullets for the groundwater arsenic PRG and sediment chromium PRG and fix the period in the third bullet of the RAOs.

Under Cleanup Objectives, please make the same general edits that EPA requested for the PRAP for Tank Farm 4, including the addition of tables to present the cleanup goals and their sources for the various media. Delete the bulleted lists at the top of the right-hand column.

Change the second bullet of the Cleanup Objectives to: "Prevent exposure of recreational and subsistence fishermen to COCs in shellfish (mussels and clams) by reducing the exposure of those shellfish to the contaminants in sediment, until shellfish contamination no longer poses a human health risk."

In the penultimate bullet, please change the objective to: "Prevent site use of groundwater until the groundwater cleanup goals have been achieved."

In the last bullet, please change "beneficial reuse" to "beneficial use."

p. 9, left column

Change the first sentence of the SO2 text "...remove soil exceeding leachability criteria, and establish and enforce land use controls to prevent residential and recreational use of the site."

Bfore the LUC sentences for SO2 and SO3, insert: "Long-term monitoring will document that soil contamination does not migrate into the groundwater or adjacent sediments."

Please add "and inspections" after LUCs for soil alternatives SO2 and SO3.

p. 9, right column

Before the LUC sentence, insert: "Long-term monitoring will document that soil contamination does not migrate into the groundwater or adjacent sediments."

Please add "and inspections" after LUCs for soil alternative SO4 and remove "soil" in the second sentence of SO4.

	Please add "LUCs and inspections" after MNA for groundwater alternative GW2.
p. 10	Bioprecipitation should not be presented because it exacerbates the deviations from natural geochemical conditions, which are not reducing conditions. An oxidation alternative, such as aeration of groundwater, is a more appropriate technology to restore natural shallow groundwater conditions and remove dissolved manganese.
p. 10, left column	Please change the first sentence in the third paragraph to "If it is determined that natural attenuation of manganese is occurring at an acceptable rate, the Navy would...."
	Please add "long-term monitoring, LUCs, and inspections" to groundwater alternative GW3 and correct typo "...subsurface chemical conditions are affected that..." in the last line.
p. 10, right column	Please add "...treatment technology, called a pilot study, would be conducted..." to the first paragraph.
	In the sixth paragraph change "four cleanup options" to "three cleanup options."
p. 11, left column	Please describe LUCs in off-shore sediment alternative SD2.
p. 11	It is not apparent that covering contaminated areas (SD-2) at the Northeast Shoreline is a practical alternative owing to the location of the contaminated areas either within the eelgrass beds or near the intertidal zone. In addition, a cover option would require covering an area larger than the area of contamination to provide a stable cover, thus likely damaging more eelgrass than a removal remedy. Covering contaminated sediment in the intertidal zone would not produce a stable remedy because of wave action. The pre-design investigation should be a component of Alternative SD-2 but removal or monitored natural attenuation should be the SD-2 remedies of choice if the cleanup goals are exceeded at the Northeast Shoreline.
	The description of SD-3 should describe what remedial measures will be taken if the sediment PRGs are exceeded in the Northeast Shoreline Area, but it is determined that it is more important to protect the eelgrass beds (MNR, LUCs, changing the PRGs, *etc.*) than remove the contamination. The PRAP could note that EPA and the Navy recognize the need to balance the benefits of contaminant removal against the potential loss of, or damage to, sensitive and valuable habitats such as eelgrass beds.
p. 11	Under the Preferred Alternatives, please note that there will be LUC inspections and long-term monitoring of contaminated soil left in place.
p. 12 left column	In the third paragraph, insert "wetland/aquatic" before "habitats." Unless the excavation or handling of the contaminated soil or the installation/maintenance of monitoring wells will take place in federal jurisdictional wetlands, the LEDPA finding should only apply to the sediment component of the remedy.

In the fourth paragraph, the TSCA finding needs to state that the removal and off-site disposal of PCB contaminated sediments will address both the ecological risk and human health risk. The finding also needs to state that the soil and debris remedies for PCBs are protective under TSCA standards (*i.e.,* excavation and off-site disposal will address PCBs exceeding industrial risk standards and LUCs will prevent residential/recreational exposure).

Table 1	Why is the SO2 "long-term effectiveness and permanence" criterion listed as "partially meets?"
Table 2	Why are GW2 and GW3, "Long-term Effectiveness and Permanence," "Short-term Protection," and "Implementability" criteria only listed as "partially meets?"
Table 3	Why is the SD2 "long-term effectiveness and permanence" criterion listed as "partially meets?" Why are the SD2 and SD3 "Short-term Protection" criteria listed as "partially meets?"
Glossary	Please change "Applicable Relevant and ...." to "Applicable or Relevant and ...."