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NS NEWPORT
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EMAIL AND EXCERPTS OF REVISED TEXT REGARDING THE U S EPA REGION I AND
RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT COMMENTS ON
THE DRAFT FINAL FIVE YEAR REVIEW REPORT AND NEW SECTION NS NEWPORT RI
(PUBLIC DOCUMENT)

11/13/2014

RESOLUTION CONSULTANTS

From: Castleberry, Cindy
Sent: Thursday, November 13, 2014 4:45 PM
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Cc: Gravette, James CIV NAVFAC MIDLANT, IPTNE (james.gravette@navy.mil); 'Ward, Darlene B CIV NAVFAC MIDLANT, PWD Newport' (darlene.ward@navy.mil); 'Moore, Deborah J CIV NAVFAC MIDLANT, PWD Newport' (deborah.j.moore@navy.mil); Kauffman, Mark
Subject: EPA and RIDEM comments on the Draft Final FYR and new section for Tanks 53 and 56

Hi Kymberlee and Pam,

We have reviewed EPA and RIDEM's comments on the Draft Final Five-Year Review Report and new section for Tanks 53 and 56. Per my e-mail from earlier this week, there are a handful of EPA comments that the Navy would like to discuss during the RPM meeting next Wednesday. For others that were not straightforward edits or additions, we plan to provide excerpts of proposed revisions. Some of these are provided below. Additionally, I plan to provide proposed revisions for Section 2.4.2.3, related edits to Section 2.5.4, and edits in response to RIDEM's comment on Section 2.4.2.1 tomorrow. I apologize for providing responses in pieces, but wanted to get those that are ready to you as soon as possible given the schedule. If these edits are not acceptable, feel free to give me or Mark Kauffman a call directly to work through additional edits.

EPA COMMENT: p. 28, §2.4.2.1, ¶1 Please explain how the Navy determined that the revetment was in good condition if the inspector did not access the revetment to conduct the inspection as suggested by the photographs. Describe how the condition of the revetment was assessed.

RESPONSE: It is assumed that this comment was meant to refer to Section 2.4.1. EPA is correct that the inspector did not walk on the revetment itself for safety reasons. Since the revetment is located immediately beyond the fence line, there was still a good view of the revetment from the landfill side of the fence line. The text currently states that "The stone revetment appeared in good condition across the western edge of the landfill cap." The following text will be added prior to that sentence: "The stone revetment was viewed from just inside the fence line separating the revetment from the landfill cap." The following text will be added after that sentence: "No areas of missing revetment stone were observed."

EPA COMMENTS: p. 38, §2.5.2, ¶7 As EPA noted in its follow-up comments for Specific Comment 40, please delete the second and third sentences that refer to human health toxicity values.

p. 38 The first part of the response to EPA's Specific Comment 40 regarding toxicity changes is not added to the last bullet of Section 2.5.2.

RESPONSE: The text has been updated to delete the second and third sentence in the bullet on Changes in Toxicity and Other Contaminant Characteristics. These sentences referred to changes in human health toxicity values. The first part of the response to EPA's Specific Comment 40 proposed the following text to be added to the bullet Changes in Toxicity and Other Contaminant Characteristics bullet: "For example, changes to the slope factors for PAHs (which were set at the most conservative of the PAHs [benzo(a)pyrene]) and PCBs, as well as the copper reference dose, would have resulted in lower calculated risks/hazards, and higher human health-based RGs." Given that this proposed text was intended to provide additional detail to support the sentences that were later requested to be removed, please confirm whether we should add this proposed text to the current revised bullet below.

"• Changes in Toxicity and Other Contaminant Characteristics: While there have been changes in toxicity values and other characteristics of site-related contaminants since the ROD, none of these changes would call into question the protectiveness of the remedy."

Also, please confirm that the following text from the draft final FYR report is still acceptable with the words "as noted above," removed from the second to last sentence:

"• Risk Recalculation/Assessment (as applicable): While there have been changes to human health risk assessment methods since the baseline risk assessments were generated (i.e., dermal exposure assessment, mutagenic carcinogen evaluation, revisions to lead modeling, and revisions to default exposure parameters), based on the methods used to establish RGs, none of these changes would affect the protectiveness of the remedy. Some of these method changes would increase the risks (e.g., mutagenic carcinogen evaluation), while others would decrease the risks/hazards (e.g., revisions to

default exposure parameters). However, as noted above, RGs were developed based on ecological exposures due to the lack of potential for human exposure. If there is a future change in the potential for human exposure, further evaluation of human health risks/hazards would be appropriate using the most current risk assessment methods."

EPA COMMENT: Appendix E.1, Figure 2-3 The color coding presented is not accurate for several COCs. For example, the arsenic MCL and RIDEM's criterion for arsenic have changed through the course of monitoring at McAllister and that is not reflected in the color coding. Currently the arsenic criterion for both EPA and RIDEM is 10 micrograms per liter ($\mu\text{g/L}$), but historically the value was 50 $\mu\text{g/L}$. Please include a note of explanation.

RESPONSE: Figure 2-3 was obtained from Watermark's Draft 2013 Annual Monitoring Report. We acknowledge that there are errors in the figure; however, given that the Final 2013 Annual Monitoring Report may not be completed and an updated figure may not be available prior to finalizing the FYR Report, we propose instead to remove the figure from Appendix E.1 and revise the sentence in the first paragraph of Section 2.4.2.1 that currently reads "The latest available figure (from the draft 2013 annual report) is included as Figure 2-3 in Appendix E.1 of this five-year review. " to instead read "Refer to Figure 2-3 of the 2013 annual report, which is expected to be finalized shortly, for the latest available figure." Additionally, the words "(note that the figure in Appendix E.1 does not show the 2011 lead exceedance in MW-103R)" will be deleted from the third paragraph of Section 2.4.2.1.

EPA COMMENT: Appendix E.2, Table 2-1 Why are the cells for STA 5+25 highlighted for each parameter?

RESPONSE: These cells were highlighted in error. The following note will be added to the figure "Screening results for STA 5+25 are highlighted in error."

EPA COMMENT: p. 85, § 5.4.3 Correct the spelling of regulations. Also, the arsenic MCL has changed since the 1992 interim ROD. Explain whether using the revised standards change any of the findings in this Five-Year Review.

RESPONSE: The typo has been corrected. The following text will be added to address the second part of the comment: "Since the ROD was issued, the EPA's drinking water standard and RIDEM's GA drinking water objective for arsenic have both been lowered from 50 $\mu\text{g/L}$ to 10 $\mu\text{g/L}$. The change does not affect the findings of this five-year review, since as noted in Section 5.4.2, arsenic concentrations during the most recent groundwater sampling event were all below the current 10 $\mu\text{g/L}$, except for one well that had high turbidity in the unfiltered sample."

EPA COMMENT: p. 86, §5.5.2 Revise this section to acknowledge that the cleanup goal for arsenic at the time of remedy selection was 50 micrograms per liter ($\mu\text{g/L}$). During the last sampling event in May 2004, arsenic concentrations were all below the current MCL for arsenic of 10 $\mu\text{g/L}$ except for one well that had high turbidity in the unfiltered sample possibly because of the use of a bailer.

RESPONSE: The last sentence in this section will be replaced with the following: "The previous five-year review had documented that groundwater monitoring results from the most recent May 2004 fifth monitoring round showed no site contaminants above current RIDEM standards and federal MCLs, with the exception of one arsenic result for an unfiltered sample, which exceeded the current RIDEM standard and federal MCL of 10 $\mu\text{g/L}$. The well had high turbidity in the unfiltered sample, possible because of the use of a bailer. Note that the arsenic cleanup goal at the time of remedy selection was based on the MCL of 50 $\mu\text{g/L}$."

RIDEM COMMENT: Appendix E.1, Figure 2-3 Please shade in red all arsenic concentrations greater than the MCL of 10 $\mu\text{g/L}$ collected in 2013.

RESPONSE: See response to EPA's comment on this figure above.

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