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EMAIL AND THE U S EPA REGION 1 ACCEPTANCE OF THE RESPONSE TO COMMENTS ON THE REVISED SAMPLING AND ANALYSIS PLAN CODDINGTON POINT NS NEWPORT RI

11/04/2013

U S EPA REGION I BOSTON MA

From: Lombardo, Ginny [mailto:Lombardo.Ginny@epa.gov]
Sent: Monday, November 04, 2013 2:36 PM
To: Thurber, Neil; Oconnor, Dominic CIV NAVFAC MIDLANT, NE IPT (dominic.oconnor1@navy.mil)
Cc: Pamela Crump; thomas.j.smith3@navy.mil; Lovely, William
Subject: RE: Response to emailed comments on revised SAP - Coddington Point

Domenic and Neil-
Thanks. EPA accepts the responses to comments. If you can send me electronic versions of the replacement pages, I can prepare EPA's concurrence letter and reference the revisions.

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From: Thurber, Neil [mailto:Neil.Thurber@aecom.com]
Sent: Monday, November 04, 2013 2:07 PM
To: Lombardo, Ginny
Cc: Oconnor, Dominic CIV NAVFAC MIDLANT, NE IPT (dominic.oconnor1@navy.mil); Pamela Crump; thomas.j.smith3@navy.mil
Subject: Response to emailed comments on revised SAP - Coddington Point

Ginny, here is the draft response to the comments presented in your email dated 10/28/13. These were reviewed with Dominic this morning.

Please call if you have additional questions and thank you for the response, Neil

- EPA's SC 7 from our 4/10/13 comment letter requested a table of the screening criteria to be used for our review. Navy's response indicated that the plan would be revised to clarify screening criteria and PALs. In the Revised SAP, WS 11-3 Goal 3 indicates that "Screening criteria include the RIDEM Direct Exposure Criteria and GB Leachability Criteria and EPA Regional Screening Levels for Soil." However, there is no referenced table. As noted in EPA's 4/10/13 comment, WS 15 includes PALs, but it still remains unclear if these are the screening criteria referenced in WS 11-3.

  The Project Action Limits (PALs) included in WS 15 represent the lower of the three screening criteria (3 sets of regulatory screening values mentioned) that are referenced in WS 11-3. For further clarity, Navy will add a reference to the PALs on WS 15 and to Goal 3 on WS 11-3 to indicate this. Hence, data collected will be screened against the PALs

listed in the SAP.

- WS 10-14, Summary of Nature and Extent of Contamination, states that "ACM…(is) not the subject of the planned investigation" and WS 10-15, CSM Summary, 1st paragraph focuses on the risks from other contaminants. This language appears to be carried over from the 1st draft which focused only on the other constituents to be evaluated. However, as clarified in other parts of the Revised SAP, this effort is being driven by known asbestos risks and a primary purpose of the RI is to better characterize and delineate potential ACM risks, so the sections referenced here should be clarified.

  Navy will revise WS 10-14, Summary of Nature and Extent of Contamination, 1st paragraph as follows:
  The planned investigation described in this SAP is intended for the **identification and delineation of buried ACM debris within the identified areas of concern, assessment of existing cover materials that may act as physical barriers to ACM, and** identification of **other** potential demolition rubble-related constituents in the soil, co-located at each of the buried debris areas. ~~C&D debris and ACM have already been identified and not the subject of this investigation, except to the extent they may be observed and recorded during the planned investigation.~~ For purposes of this RI, the extent of debris and other constituents in the subsurface includes the study area boundaries. The extent may be shown to be less as additional information is obtained during the RI in the field or from additional historical documentation.

  Resolution will revise WS 10-15, CSM Summary, 1st paragraph as follows:
  Data to be collected during the planned investigation will be used to determine **the presence of buried building demolition debris assumed to contain ACM, the presence of existing cover materials that may act as physical barriers to ACM, and whether** ~~if~~ the known areas of buried building demolition debris resulted in the release of other constituents**. The analytical data will be used** to assess potential risks to receptors from these contaminants, if present, and position each of the Coddington Point study areas for contaminant delineation and/or further evaluations. Figure 3 presents a graphical depiction of potential exposure pathways. These pathways present the potential sources, pathways and receptors that are likely to be evaluated during this investigation or subsequent investigations/evaluations.

- WS 11-1, Step 2, Goal 1. It should be noted here that it is Navy's CSM that buried debris may contain ACM, so that the delineated buried debris areas will be assumed to be the limits of ACM risks.

  Agree. The assumption will be added to Goal 1. The revised goal would read as follows:
  Goal 1 - Identify and delineate the buried debris in each area of concern where buried debris is suspected **and where the limits of buried debris are assumed to be the limits of ACM risks**.

- WS 17-1, Overview. EPA no longer accepts the 1% by volume asbestos number as a safe screening level. Refer to EPA's Framework for Investigating Asbestos Contaminated Sites at http://www.epa.gov/superfund/health/contaminants/asbestos/pdfs/framework_cover_memo.pdf.

If asbestos is identified in surface soils, the area will either need to be adequately covered consistent with NESHAPs requirements or Navy would need to consider activity-based sampling to demonstrate that levels did not exceed risk criteria.

It is recommended that the related sentence in first paragraph of WS 17-1 (1% reference) be replaced with the following:
For asbestos analyses, the laboratory detection level is proposed as the PAL since there is no specific regulatory criterion to apply. The detection level of 0.25% will be used as the PAL and to assess the presence or absence of asbestos in a sample.

- WS 17-1, Soil Sampling. Change the reference of "Figures 4 to 6" to "Figure 9". For Bishop's Rock, for the areas to be evaluated by EM/GPR, clarify that the sample locations shown in Figure 9 are illustrative and that actual sample locations will be proposed for review and approval after the EM/GPR is completed and the data re analyzed and presented for consideration.

  Agree. The figure reference will be corrected and a note will be added to the text for clarification regarding the Bishop's Rock sample locations.

- WS 21-1. The addendum with the asbestos information did not include a revised WS 21-1.

  The approach to asbestos inspection is forthcoming.