



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

BY FACSIMILE AND MAIL

March 16, 1995

Deborah Carlson, RPM
U.S. Department of the Navy
Northern Division
Naval Facilities Engineering Command
10 Industrial Highway
Code 1823, Mail Stop 82
Lester, PA 19113-2090

RE: Evaluation of the Navy's Responses to EPA's Comments on the draft final Phase II Remedial Investigation Report for the Old Fire Fighting Training Area, Naval Education and Training Center (NETC), Newport, Rhode Island

Dear Ms. Carlson:

Attached you will find comments on the above-referenced primary document. These comments are listed as both specific and general comments and reference the numbering system used in EPA's letter of September 13, 1994.

EPA does not concur with this draft final primary document pursuant to Section 7.2(a) of the Naval Education and Training Center Federal Facility Agreement, dated March 23, 1992 (FFA). EPA is not invoking formal dispute resolution pursuant to FFA Section 13.3 based on our understanding from discussions with you that some of the critical issues identified in the attached comments will be addressed by the outstanding field work associated with the ecological risk assessment.

In the event that we do not reach a satisfactory resolution of the attached comments or the ecological risk assessment associated with the Old Fire Fighting Training Area, then this letter shall constitute a written statement of dispute pursuant to Section 13.3 of the NETC FFA.

In general, the response to our comments address our concerns. However as previously discussed, EPA is still awaiting the results of the ecological risk assessment. Consequently, EPA can only concur that the portions of the RI that we have received to date are complete. Once we receive the ecological risk assessment, EPA can forward our final concurrence upon request.



After completing your review of the attached document, please call me at 617/573-5777 if you have any questions.

Sincerely,



Kymerlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: Susan Svirsky, EPA
Ken Finkelstein, NOAA
Paul Kulpa, RI DEM/DSR
Brad Wheeler, NETC
Mary Pothier, CDM-FPC

3/27/95 CC: PROJECT FILE
CODE 1822/TB
HNUS (K. SCULLY)

**EVALUATION OF NAVY'S RESPONSE TO COMMENTS
ON THE
DRAFT FINAL REMEDIAL INVESTIGATION REPORT
OLD FIRE FIGHTING TRAINING AREA**

Attachment A

The Navy's responses and the following comments reference the numbering system used in EPA's letter of September 13, 1994.

Responses to EPA comments #4 through #9, #11i, #12 and #14i require the Navy to correct discrepancies noted in the draft final reports. Although the Navy has agreed to revise the text of the final Phase II RI report, it is unclear how these corrections will be transmitted to EPA in order to verify that they have been made (e.g., revised pages to be sent or a revised report).

I. General Comments

1. While the Navy's response attempts to clarify their position with regard to determination of PAH sources, it is the assumptions behind the analysis done by the Navy that is in question, not what the results of this analysis state.

Revise the RI report to fully document the applicability of the PAH analysis to this situation. The documentation must include the limitations, uncertainties, and assumptions behind this type of analysis.

- 2/3. Ensure that the noted documentation to support the Navy's position on both these comments is included within the RI report.

II. Specific Comments

10. Response is acceptable; providing the additional note of 24 parts per thousand (ppt) value for Narragansett Bay is important.
- 11(ii). Since the portion of the curve used to determine hydraulic conductivity (K) for the two slug tests are 0.25-0.65 seconds (for K = 20.49 ft/day) and 0.45-1.20 seconds (for K = 7.56 ft/day), i.e. the early response of neither is used, it would appear the difference in K is due to an actual difference in the slope of the curve. However, as is pointed out, since the results are being used primarily to estimate ground water flow rates accurate to within 1-2 orders of magnitude the difference is not significant.

III. Response to Comments

13,14. The original comment response does not state that the results of the EM-31 and magnetometer surveys were presented in the Draft Final RI report, it states that the "results of the...survey[s] will be added to the revised RI reports".

Although the requested figures were added to the report as the Navy states, some additional discussion of the results is requested.

20,21,24 and 29

EPA concurs with the Navy that they have not misrepresented the use of the term "contaminant-comparison level" in the RI report. It is also agreed that the Navy's use of the term does not imply "a risk-based genesis or federal/state acceptance" to the Navy.

Nevertheless, EPA reiterates its position that such misinterpretation would likely be made by state and federal risk assessment personnel and others reading the report who were unfamiliar with the Navy's position and view on this matter.

The Navy may wish to further reconsider the use of the term "contaminant-comparison value".