



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
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NAVSTA NEWPORT RI
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June 14, 1999

James Shafer, Remedial Project Manager
U.S. Department of the Navy
Naval Facilities Engineering Command
Northern Division
10 Industrial Highway
Code 1823, Mail Stop 82
Lester, PA 19113-2090

Re: Response to EPA Comments on the Draft Old Fire Fighting Training Area Marine Ecological Risk Assessment Report, Naval Station Newport, Newport, Rhode Island

Dear Mr. Shafer:

EPA reviewed the *Navy Responses to Comments from USEPA on the Draft Old Fire Fighting Training Marine Ecological Risk Assessment Report*, dated February 1999 for technical sufficiency. The Navy response to comments are dated May 21, 1999.

Cover Letter Comment 1: Since large plumes of smoke were historically generated during fire training exercise, an analysis of prevailing winds at the site could assist in predicting the likely pattern of airborne deposition of contaminants related to site activities.

Cover Letter Comment 2: Although additional text for the uncertainty section has been proposed and is currently under review, the response does not address the entire comment on the appropriateness of the selected reference stations. The comment requested that the site to reference station comparability discussion in the ERA be enhanced to include an evaluation of the salinity, dissolved oxygen, and temperature comparability. Please include this comparison in the next version of the ERA. Further, I understand that the Navy will be formally responding to RIDEM's request to drop reference station 23 from the ERA analyses and that RIDEM will define what they consider to be background or reference so that arbitrary elimination of data may be avoided.

Specific Comment 3: The last paragraph of Section 5.2.2 on page 5-56 suggests that most or all of the toxicity observed in the *Arbacia* larval development tests can be attributed to un-ionized ammonia. Comment 3 indicates that there are other factors that could contribute to toxicity at these sites (other than un-ionized ammonia). While the reworded paragraph is acceptable, it should also be stated that other factors could contribute to the observed toxic response and that these factors could account for the four other stations that had high IC₁₀ values but also had high un-ionized ammonia concentrations (*see* Figure 5.2-4).

Specific Comment 11: While the reworded paragraph presented in the response is acceptable, the paragraph in the ERA that discusses PCBs and p,p'-DDE in elutriate samples should also be changed to state that it is not certain the extent to which PCBs and p,p'-DDE have contributed to observed toxicity in elutriate samples.

Specific Comment 14: Please add the discussion of assumptions as presented in the response to the uncertainty section of the ERA.

Specific Comment 16a (Table 6.1-2b): This comment discusses the WQSV calculated for high molecular weight ("HMW") PAHs as presented in Table 6.1-2b. The response indicates that the value was calculated correctly using the six HMW PAHs "footnoted in the table." The calculation cannot be verified since the response does not specify the identity of the six HMW PAHs. The footnote appearing on Table 6.1-2b states that eight HMW PAHs were used for this calculation. It is unclear which HMW PAHs are used for the WQSV calculation. The footnote should be revised in the next version of the ERA to specify the PAHs.

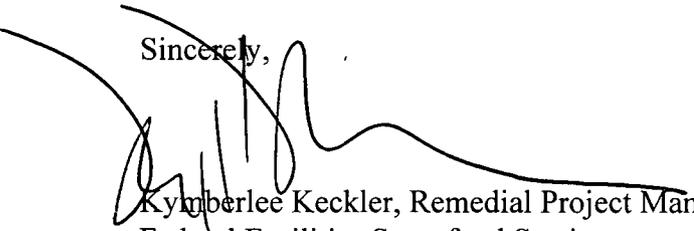
Comment 16b (Table 6.1-2b): This comment discusses the WQSV calculated for low molecular weight ("LMW") PAHs as presented in Table 6.1-2b. The response indicates that the value was calculated incorrectly owing to a spreadsheet error and will be resolved. It was also mentioned in the response that the number was derived using the values for the seven LMW PAHs "as footnoted in the table." The calculation provided in the response cannot be checked because the aforementioned footnote appearing on Table 6.1-2b states that ten LMW PAHs were used for this calculation. It is unclear which LMW PAHs are used for this calculation. The footnote should be revised to specify the PAHs.

Comment 16e (Table 6.1-2b): This comment discusses the calculation of the WQSV for total PAHs. It is unclear, as previously stated, which PAHs were selected for this calculation based on the footnote presented for Table 6.1-2b. The numbers and calculations presented in the response cannot be checked because of this discrepancy discussed previously for Comment 16a and 16b. The footnotes need to be clarified to resolve this issue.

Comment 17d: Revise Table D-7-1a to specify the units (nmoles/g).

I look forward to working with you and the Rhode Island Department of Environmental Management toward the cleanup of the Old Fire Fighting Training Area. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,



Kimberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

cc: Paul Kulpa, RIDEM, Providence, RI
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