



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

May 30, 2000

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: Final Old Fire Fighter Training Area Marine Ecological Risk Assessment

Dear Mr. Shafer:

I am writing in response to your request for EPA to review the *Final Old Fire Fighter Training Area Marine Ecological Risk Assessment* dated April 2000. Overall, EPA is pleased that the majority of its comments have been adequately addressed. Detailed comments are provided in Attachment A.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Kymberlee Keckler", written over a horizontal line.

Kymberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: Paul Kulpa, RIDEM, Providence, RI
Melissa Griffin, NETC, Newport, RI
Cornell Rosiu, USEPA, Boston, MA
Jennifer Stump, Gannet Fleming, Harrisburg, PA
Ken Finkelstein, NOAA, Boston, MA
Steven Parker, Tetra Tech-NUS, Wilmington, MA
Mary Philcox, URI, Portsmouth, RI
David Egan, TAG recipient, East Greenwich, RI

ATTACHMENT A

Page

Comment

Prior Comment 4

In the original comment, EPA noted that some information was not transferred from Table 6.3-3 to Table 6.3-4. The comment stated that for the Cunner and Pitar, both Heron and Gull risk rankings for OFF-23, presented as low "+" in Table 6.3-3, were not presented in Table 6.3-4. The response states that the information has been transferred to Table 6.3-4. EPA noted in an October 25, 1999 letter regarding the review of the responses to EPA comments, that all of the rankings for the Gull have changed from low (+) to baseline (-) which did not correspond to the draft final version of Table 6.3-3. In the final version, Table 6.3-3 does correspond with the final version of Table 6.3-4 but it was Table 6.3-3 that changed, not Table 6.3-4. It appears that a change in the food consumption rate (FCR) presented in Table 6.3-1 is what caused all of the rankings for the Gull in Table 6.3-4 to change from low to baseline. It is unclear why the FCR changed from 0.50 kg dry wt/day to 0.064 kg-prey/kg-RoC/day. According to the equation from Nagy, 1987 provided in Table 6.3-1, the FCR of 0.50 kg dry wt/day was correctly calculated in the draft final version of the report. Clarification should be provided for why the FCR in Table 6.3-1 changed causing the risk rankings in Tables 6.3-3 and 6.3-4 to change.

Prior Comment 8

A note attached to the response to Prior Comment 8 states that three of the column headings in Table 6.3-1 will be changed in the final version of the ERA report. For the Food Consumption Rate and Exposure Factor columns, it was proposed that the units be changed to (g dry wt/day). For the Feeding Fraction column, units would be changed to (g prey/g total diet). Units for the Feeding Fraction column were correctly changed in the final version of Table 6.3-1. However, units for the Food Consumption Rate and Exposure Factor columns were both changed to (kg-prey/kg RoC/day), not (g dry wt/day). These units do not match either the units presented in the note attached to the response to Prior Comment 8 or the units presented in the dose equation in Section 6.3.3.1 on page 6-23. This discrepancy should be addressed and Table 6.3-1 should be revised as appropriate.