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June 19, 2001

Project Number N7538

Mr Kenneth Finkelstein
U.S. Department of Commerce
National Ocean Service
c/o EPA Office of Site Remediation and Restoration (HIO)
One Congress Street
Boston, Massachusetts 02114

Reference: CLEAN Contract No. N62472-90-D-1298
Contract Task Order 0282

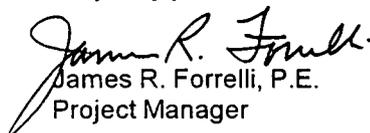
Subject: Response to NOAA Comments
Draft Feasibility Study Report
Old Fire Fighting Training Area, Naval Station Newport, Newport, Rhode Island
Received in NOAA letter to James Shafer of the U S. Navy dated May 21, 2001

Dear Mr. Finkelstein:

The Navy has reviewed the comments generated by NOAA in its review of the Draft Feasibility Study Report for the Old Fire Fighting Training Area site at Naval Station Newport in Newport, Rhode Island. The Navy's responses to NOAA's additional comments are provided in Attachment A (two copies). NOAA's comments are presented verbatim in italic type followed by the Navy's response in standard type. Comments are numbered consistent with the NOAA's letter except that Comment No. 1 has been broken down into Comments Nos. 1.a, 1.b, and 1.c for ease in associating responses to specific issues raised in Comment No. 1

Please contact Jim Shafer of the Navy me or if you have any questions about this transmittal or would like to discuss this matter further.

Very truly yours,


James R. Forrelli, P.E.
Project Manager

JRF:rp

Enclosure

- c. J. Shafer, EFA Northeast (w/enc. - 3)
- M. Griffin, NAVSTA Newport (w/enc. - 2)
- K. Keckler, EPA (w/enc. - 2)
- P. Kulpa, RIDEM (w/enc - 4)
- C. Powell, RIDEM (w/enc.)
- K. Andersen, CRMC (w/enc.)
- M. Imbriglio, NAVSTA/RAB (w/enc - 5)
- J. Stump, Gannet Fleming (w/enc. - 2)
- D. Egan, TAG (w/enc.)
- G. Tracey, SAIC (w/enc.)
- J. Trepanowski/G. Glenn, TtNUS (w/enc.)
- C. Race, TtNUS (w/enc.)
- File N7538-8 0 (w/enc.)/File N7538-3.2 (w/o enc.)

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ATTACHMENT A
Responses to Comments from the
National Oceanic and Atmospheric Administration
Old Fire Fighting Training Area Draft FS (April 2001)
Comments dated May 21, 2001

General Comments

No. **Comment/Response**

- 1 *Comment: This FS may be summarized as a decision document to remove contaminated sediment or not. Sediment Alternatives 1 and 2 are grouped together under no or very limited action and Sediment Alternatives 3 and 4 are nearly identical in scope and cost, differing only with regard to removing or not removing sediment underlying the eelgrass. This latter issue is best discussed with the technical review team whereby pros and cons of each may be orally discussed.*

Response: The Navy will conduct a survey this summer to make a qualitative determination of the presence of bivalves, particularly scallops and oysters, as well as eelgrass and other marine organisms living in the sediments near the OFFTA site. Discussions regarding the handling of potential eelgrass beds and other marine organisms within sediment remediation alternatives can be held when the survey results are available.

Specific Comments

- 1 a. *Comment: Of particular interest to NOAA are stations OFF-2, 3, 5, and 6, all of which show elevated total PAH concentrations. The text proposes remedial action based on PRG exceedences at, and adjacent to, Stations, 3, 5, and 6 This is clearly shown on Figure 2-4 The area designated for clean-up is acceptable to NOAA although only Station #5 showed unacceptable ecological risk. But one question concerns the selection of specific semivolatile PAHs (Table 2-13) as contaminants of concern. First, it is unclear why fluoranthene is not a contaminant of concern given the very high concentrations is the stations listed above. Section 2.2.3.1 (page 2-13) Identification of Chemicals of Potential Concern (COPC) in Sediment makes note that sediment COPCs were selected based on the Ecological Risk Assessment (SAIC, 2000). I am unclear how fluoranthene could not be a COPC. Are sediment concentrations greater at the references locations?*

Response. Fluorethene was not retained as a COPC because, although it had some of the highest bulk sediment concentrations, it did not have the highest porewater concentrations relative to the water quality screening level (WQSV). Therefore, as presented on Table B-3.9, there were no stations where fluoranthene had the greatest TEV_{HQ} (porewater concentration divided by the WQSV), so it was not identified as a limiting COPC.

- 1 b. *Comment: Secondly, I am unclear why a PRG based on ecological risk was not calculated for benzo(a)anthracene or for benzo(b)fluoranthene. It is noted that the PRGs based on human health shellfish ingestion for these two chemical are 34,270 ug/kg and 51,296 ug/kg, respectively well above sediment screening levels or Apparent Effect Thresholds Hence, despite high site-specific concentrations of these chemicals in nearshore sample locations, they do not drive the remediation because the PRG is so high. NOAA is aware that this might be a moot point given that the exceedence of other COCs will drive remedial action where these chemical concentrations are highest. In fact, when reviewing Appendix B, Step #7 (page 3-6) the text states just that; "limit the contaminants for which PRGs are developed to the contaminants that are causing the highest risk at each stations." But Figure 2-4 shows several exceedence of PRGs per station; granted these are limiting PRGs as calculated in Table B-3 9. Although the text explains the limiting PRG approach, Figure 2-4 shows only a few PRG exceedences when there are actually more as shown in Table B-3.9. The reader who quickly reviews the document, focusing on Figures and Tables would believe that few PRGs are exceeded when in fact many might be exceeded. NOAA would like to see Tables*

2-13 to 2-15 adjusted to include PRGs based on ecological risk for these two chemicals as the calculation of Table B-3.9 begins to do.

Response: Benzo(a)anthracene and benzo(b)fluoranthene were not retained as COCs for the same reason that fluoranthene was not (see response above). However, NOAA correctly notes that other COCs are driving the remediation where those two chemicals have their greatest detections.

Table 2-13 will be adjusted to show all COPCs shaded in Table B-3.6. These are the contaminants that exceed the Water Quality Screening Value. Tables 2-14 and 2-15 show calculated PRGs, from Table B-3.9. For clarity, these two tables will be revised, and further explained in the text. No revisions to Figure 2-4 are anticipated.

- 1.c. *Comment: Lastly, back to Fluoranthene. It appears when reviewing Step 1 in Part 3 of Appendix B along with Table B-3.1 that Fluoranthene is eliminated as a potential PRG candidate because we have an actual AWQC value of 16 ug/l. Only the chemicals that do not have such an actual value, but force the authors to calculate one using a sediment benchmark and EQP process, move forward through the PRG process. Is this because this method results in a WQSV low enough to allow calculation of a limiting PRG? There may be a problem in the method that would eliminate fluoranthene but keep other lesser understood chemicals.*

Response: As is shown on Table B-3.1, the PAH WQSVs that are back-calculated from sediment concentrations are typically lower than the WQSVs for the PAHs that are water-based (e.g., acenaphthylene, fluoranthene, naphthalene, and phenanthrene). This indicates that WQSVs that are back-calculated from sediment concentrations are probably lower than if they were based on water-only studies (if adequate data were available). Therefore, this approach is conservative because it yields lower PRGs than if only the chemicals that have water-based WQSVs were used.

2. *Comment: Reference atop of Page 2-17 referencing EPA Draft Sediment Guidelines (EPA, 2001) is not provided in the text References. It is provided at the end of Appendix B but dated 2000.*

Response: The reference on page 2-17 will be changed to EPA, 2000.