



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

N62661 AR 001484  
NAVSTA NEWPORT RI  
5090 3a

December 3, 2001

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

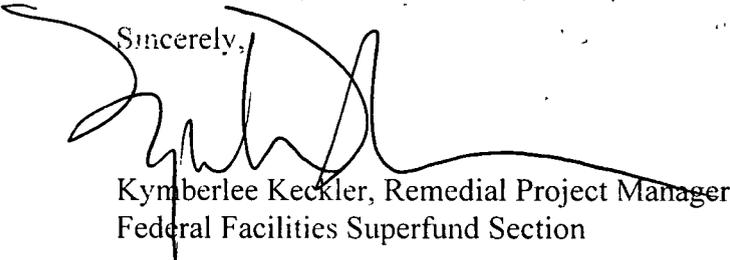
Re: Draft Final Sediment PRG Development for the Old Fire Fighting Training Area at the  
Naval Station Newport, Newport, RI

Dear Mr. Shafer:

EPA reviewed the Draft Final PRGs for Marine Sediment Old Fire Fighting Training Area, dated  
November 9, 2001. 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 Old Fire Fighting Training Area. Please do not hesitate to  
contact me at (617) 918-1385 should you have any questions.

Sincerely,



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

| <u>Page</u>  | <u>Comment</u>   |
|--------------|--|
| p. 2-2       | <p>The second full paragraph within the "STEP 1" section discusses the need to adjust risks from arsenic in seafood based on the toxicity of the form of arsenic found in seafood versus the form of arsenic on which the USEPA's cancer slope factor is based. The text states that the shellfish EPC was multiplied by a factor of 10 to estimate the tissue concentration of bioavailable arsenic. As shown on Table B-2.1, the Tissue EPC presented for arsenic is 8.55 mg/Kg. This is the same EPC used in the OFFTA RI, as presented in Table 6-8.32 of the RI. Therefore, the tissue EPC used in the PRG calculation has not been adjusted. On the other hand, the cancer risk for arsenic presented in Table 6-8.32 of the RI was 9.74E-5, whereas the cancer risk for arsenic presented in Table B-2.1 is 9.74E-6. It appears that, rather than adjusting the EPC for arsenic up by a factor of 10 in the PRG calculations, the low bioavailability of arsenic in seafood was accounted for by adjusting the risk down by a factor of 10. The method of adjusting the risk downward to account for the low bioavailability of arsenic in seafood is acceptable. However, currently the text does not correctly explain the adjustment method actually used. The text on page 2-2, which indicates that the original EPC was adjusted upward by a factor of 10, should be removed. The replacement text should explain that the cancer risk originally presented in the RI was adjusted downward by a factor of 10 to account for the low bioavailability of arsenic in seafood. This new text should also replace the current "***" footnote on Table B-2.1. These text corrections will greatly improve the clarity of the arsenic PRG calculations summarized in Table B-2.1.</p> |
| Table B-4.1C | <p>The PRG for 2-methylnaphthalene is exceeded at station OFF-5 but is not shaded in Table B-4.1C to indicate such.</p>  |