



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

February 10, 2005

Curt Frye, Remedial Project Manager
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: Residual Risk Calculations for Various Removal Options, Old Fire Fighter Training Area,
Naval Station Newport, Newport, Rhode Island

Dear Mr. Frye,

The Rhode Island Department of Environmental Management, Office of Waste Management has reviewed the Residual Risk Calculations correspondence for Various Removal Options, Old Fire Fighter Training dated January 11, 2005 and supporting data CD Residual Risk Summary, dated January 14 2005. Comments on these submittals were verbally broached during a meeting held on February 3, 2005. Per the request of the Navy the Office of Waste Management is submitting the aforementioned comments in writing, attached herein.

If the Navy has any questions concerning the above, please contact this Office at 401-222-2797, ext. 7111.

Sincerely,

A handwritten signature in cursive script that reads "Paul Kulpa".

Paul Kulpa
Office of Waste Management

cc: Matthew DeStefano, DEM OWM
Richard Gottlieb, DEM OWM
Kymberlee Keckler, EPA Region I
Cornellia Mueller, NSN



**Comments on
Residual Risk Calculations for Various Removal Options
Site 9, Old Fire Fighting Training Area**

1. General Comment

The exposure duration for the residential exposure scenario used in the evaluation was 240 days per year. Please be advised that the exposure duration for the residential scenario under the Rhode Island Department of Environmental Management Site Remediation Regulations is 350 days per year. Please recalculate the residual risk estimates using the 350-day exposure duration.

2. General Comment

The "A" scenarios assume that the excavation will be dug to the PRGs. That is, all soils exceeding the PRGs would have been removed from the excavation and the concentration of a particular contaminant left in the excavation would be equal to or lower than the PRG. As such, in order to evaluate residual risk, the respective PRGs should be employed in the "A" exposure scenarios. A review of the supporting data tables on the CD indicates that this is not the case (that is concentrations above the PRG were used in the residual risk evaluation). Please recalculate the "A" exposure scenarios using the appropriate PRGs.

3. General Comment

Dieldren, PCBs, etc were identified as contaminants of concern (COCs) for the site. The concentration of these contaminants in the risk tables was listed as zero. This may be an artifact of concurrent removal of other contaminants or simply an oversight. If the former is true, please explain in the submittal how these contaminants were identified as COCs, yet concentrations for these contaminants were not used in the risk calculations, if the latter is true the risk assessment should be recalculated using the appropriate values.

4. General Comment

The risk assessment was calculated using the both the average concentration and the maximum concentration. Typically when calculating the risk associated with the average concentration the 95 % UCL is used. This was not done. Please recalculate the average using the 95% UCL