



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

N62661 AR.001749
NAVSTA NEWPORT RI
5090 3a

June 7, 2004

Curtis Frye
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 RI Work Plan, Site 17, Gould Island

Dear Mr. Frye:

EPA reviewed the responses to EPA's letter dated August 27, 2003 regarding the Draft Final RI Work Plan, Site 17, Gould Island. Detailed comments are provided in Attachment A.

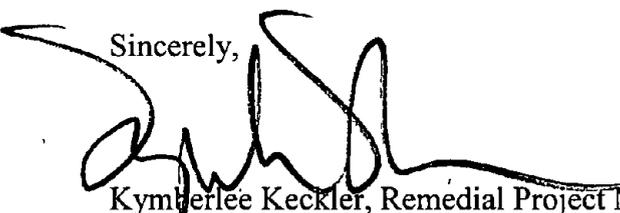
The response to general comments 2 and 3 indicates that the risk criteria and action limits will be revised as necessary per the agreements reached at the Technical Meeting of April 8, 2004. Final evaluation of the Work Plan is required in order to verify that these appropriate risk criteria and action limits are incorporated into the human health risk assessment.

With regard to general comment 3, EPA did not agree to use two sets (*i.e.*, residential PRGs for recreational receptors and industrial PRGs for commercial receptors) of Region 9 PRGs for screening COPCs at the Technical Meeting on April 8, 2004. EPA Region 1 requires that EPA Region 9's residential risk-based PRGs be used for screening COPCs for all receptors.

Please clarify what is meant by "Tier 1 of the human health risk assessment process" in the response to general comment 4. EPA requires that for those chemicals that are screened out of the COPCs list need an evaluation in the Risk Characterization section of the risk assessment.

I look forward to working with you and the Rhode Island Department of Environmental Management toward the cleanup of Gould Island. 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

Toll Free • 1-888-372-7341

Internet Address (URL) • <http://www.epa.gov/region1>

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on Recycled Paper (Minimum 30% Postconsumer)

1544

Attachment

cc: Paul Kulpa, RIDEM, Providence, RI
Cornelia Mueller, NETC, Newport, RI
Bart Hoskins, USEPA, Boston, MA
Chau Vu, USEPA, Boston, MA
Jennifer Stump, Gannet Fleming, Harrisburg, PA
Ken Finkelstein, NOAA, Boston, MA
Steven Parker, Tetra Tech-NUS, Wilmington, MA

ATTACHMENT A

<u>Page</u>	<u>Comment</u>
1. § 3.2.1.6	<p>The original comment expressed a concern for the injection of water into the formation during the packer test, which could then bias the subsequent water sampling and analysis. The Navy reply states, “The pressure flow test can be conducted in reverse...,” and notes that the work plan will be revised to reflect this change. It is not clear at this point what procedure is being proposed (<i>e.g.</i>, impose a head drop, rather than an increase?). This will presumably be detailed in the revised work plan. Final resolution will depend upon the details given in the revised work plan.</p>
4. Figure 3-1	<p>The original comment recommended further discussion of the final location of the proposed well cluster along the east side of the building. These wells are intended, in part, to provide better constraints on flow direction and on potential contamination originating within the building, particularly in the plating shop and solvent areas. The reply suggests that final well locations can be determined following installation of the shallow borings within the building footprint. This procedure can provide a better basis for locating the exterior wells. Will analytical results from the “inside” shallow borings be available in time to support these decisions? What process will be followed to obtain regulator concurrence on the final well locations?</p>
8. Table 5-2	<p>EPA will review the revised input parameters and calculations to be included in the revised work plan. Final resolution will depend upon the details given in the revised work plan.</p>
9. Table 5-3	<p>Please explain how the shellfish ingestion rates will be implemented with the current receptors proposed for the site. I presume that the adult recreational receptor will be exposed to the recreational fishing ingestion. However, it is not clear which receptor will be exposed to the subsistence shellfish ingestion.</p> <p>EPA agrees that the fish consumption rate can be lowered to half of the EPA default value because of fishing conditions at the site. However, the rationale should be more fully explained the Work Plan. If subsistence fishing exists at the site, the EPA default rate should be used since it is assumed that these subsistence anglers fish and consume fish from the site as the main part of their diet.</p>