



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 1  
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August 5, 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: Gould Island Remedial Investigation Work Plan

Dear Mr. Frye:

EPA reviewed the Work Plan for Remedial Investigation Site 17 Building 32 Gould Island, dated July 2004. The Work Plan represents revisions of a draft version dated January 2003, following subsequent exchanges of comments and responses. The current document was reviewed with particular attention to the incorporation of changes committed to by Navy in its responses to comments dated July 1, 2004. Most of EPA's previously generated comments have been adequately addressed and subsequent changes to the Work Plan have been incorporated into the document, with exceptions noted in Attachment A. It does not appear necessary to revise the entire document.

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,

Kimberlee Keckler, Remedial Project Manager  
Federal Facilities Superfund Section

Attachment

cc: Paul Kulpa, RIDEM, Providence, RI  
Cornelia Mueller, NETC, Newport, RI  
Bryan Olson, USEPA, Boston, MA  
Bart Hoskins, USEPA, Boston, MA  
Chau Vu, USEPA, Boston, MA  
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## ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. 3-2, §3.1	The original response to this comment stated that the discussion of goals would be expanded to indicate that a goal would be added to “Ensure that the sample program will provide sufficient data for the risk assessments.” These goals have not been changed since the draft version of this document.
p. 4-3, §4.2	The Project Action Limits have been changed to reflect the EPA Region IX residential Preliminary Remediation Goals. There is a discrepancy in the text: “Project action limits for soils were selected using the lowest risk-based or regulatory screening values from ... 2) USEPA Region IX PRGs for industrial soils ....” Footnote (2) for Table 4-2A indicates that the residential PRGs were in fact used in identifying PALs.
p. 4-4, ¶¶3 & 4	Change “industrial” to “residential” for the screening values used for project action limits. These appear to be typos since the values presented in the following tables are for the residential scenario, which is what EPA requires.
p. 5-3, §5.2	According to the EPA Region 1, August 1994 Risk Update Number 2, the exposure point concentration for evaluation of groundwater ingestion is the maximum detected concentration of each contaminant in any well, or the highest average concentration of each contaminant across any single well (if there is more than one round of data). Please keep this in mind when evaluating the Construction Worker’s exposure to groundwater.
p. 5-10, Table 5-2	The current risk assessment will evaluate the <i>fisherman</i> receptor solely for exposure to contaminants ingested from shellfish. Evaluating this receptor to only one media at the site may underestimate this receptor’s total risk from the site. This potential underestimation of this receptor’s risk must be discussed in the Uncertainties Section of the Human Health Risk Assessment. Please also make sure that the fisherman receptor will be evaluated for two separate categories: subsistence and recreational fishermen. Different exposure parameters such as exposure frequency, exposure duration, and fish ingestion rate should be considered and applied to the risk evaluation of these receptors.
Table 5-4	This table needs clarification. As agreed upon by the Navy in responses to comment #9 on page 2 of the July 1, 2004 letter, two receptors will be evaluated for fishing: recreational angler and subsistence angler, with recreational fish ingestion rates being applied for recreational angler and subsistence fish ingestion rates being applied for subsistence angler. Table 5-4 should have separate columns for each receptor for both RME and CTE

scenarios. The footnote for this table specified that for adult and child, rates used for RME are half of EPA's suggested rates for subsistence and rates used for CTE are half of EPA's suggested rates for recreational anglers. Each receptor should have the appropriate rates for both RME and CTE.

According to the response regarding the use of half of EPA's default rates because of the fishing conditions at the site, a fully described rationale will be provided in the Workplan. EPA previously commented that 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. If the Navy proposed to use a portion of this default rate rather than the default itself based on the fishing condition at the site, a rationale must be provided in the Workplan.