



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203-0001

July 17, 1995

Robert Krivinskas, 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: Responses to EPA Comments on the *Draft Final Work/Quality Assurance Plan for the Narragansett Bay Ecorisk and Monitoring for Navy Sites* (June 14, 1995)

Dear Mr. Krivinskas:

I am writing in response to your request for EPA to review the Navy's responses to EPA comments on the *Draft Final Work/Quality Assurance Plan for the Narragansett Bay Ecorisk and Monitoring for Navy Sites* dated June 14, 1995. The following comment numbers refer to respective EPA comment numbers listed in EPA's letter dated March 24, 1995. Only those responses that are in question are discussed below. I have also summarized the issues resolved at the June 28, 1995 Ecological Advisory Board ("EAB") meeting.

Comment No. 1: Uncertainties must be evaluated as part of any risk assessment. Accordingly, the text should be revised to include a discussion of uncertainties in accordance with EPA's Framework for Ecological Risk Assessment. As discussed at the June 28, 1995 EAB meeting, the specific location of the uncertainties discussion in the reports is not important as long as it is included (*see also* comment numbers 7, 8, 13, 17, 22, & 28).

Comment No. 3: EPA is still awaiting clarification regarding the proposed use of data on pathogens in the ecological risk assessment (*see also* comment numbers 10, 21, 27, & 30). How will this information be used to support the ecological risk assessments at NETC? Fate and transport of microorganisms, or other biological indicators in the bay, are not the same as for the chemicals of concern. As agreed at the June 28, 1995 EAB meeting, direct measurements of Biochemical Oxygen Demand ("BOD") or Dissolved Oxygen ("DO") will be taken instead of pathogen data. The report should be revised accordingly.

Comment No. 9: Based on the June 28, 1995 EAB, EPA understands that the Navy is going to consider osprey as an avian predator. However, osprey will be considered strictly as a piscivorous avian predator, different than red-breasted merganser and great blue heron (*see also* comment numbers 20, 26, & 29)

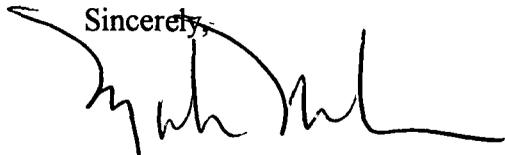
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I look forward to working with you on this issue. Please do not hesitate to contact me at (617) 573-5777 should you have any questions or wish to arrange a meeting.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kymberlee Keckler', written over the word 'Sincerely,'.

Kymberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

cc: Paul Kulpa, RIDEM, Providence, RI
Brad Wheeler, NETC, Newport, RI
Bob DiBiccaro, USEPA, Boston, MA
Susan Svirsky, USEPA, Boston, MA
Mary Pothier, CDM, Boston, MA
Ken Finkelstein, NOAA, Boston, MA