



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

N62661 AR 000692
NAVSTA NEWPORT RI
5090 3a

February 12, 1996

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: Comment on the Final Work/Quality Assurance Project Plan for NETC, dated July 28, 1995

Dear Mr. Krivinskas:

I appreciate your willingness to let EPA review the *Final Work/Quality Assurance Project Plan* for NETC, dated July 28, 1995 again as it will help us with future ecological risk assessments ("ERAs") at NETC. Fortunately, our second review only identified one issue that needs to be resolved. EPA discussed this issue with you briefly on January 17, 1996. Detailed comments are provided in Attachment A.

I look forward to working with you on revising the McAllister Point Landfill ERA and on other upcoming ERAs. Please do not hesitate to contact me at (617) 573-5777 should you have any questions or wish to arrange a meeting.

Sincerely,

Kimberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

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
Steven Parker, Brown & Root, Wilmington, MA

ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. 13, ¶4, § 2.1.2.1	<p>ERAs should not use the hazard quotient (“HQ”) method (<i>i.e.</i>, a ratio of detected concentration to biological benchmark on a chemical by chemical basis) to identify contaminants of concern (“COCs”). The HQ method of analysis is only for the risk characterization of the COCs.</p> <p>As discussed on January 17, 1996, the selection of COCs in the ERA should work from data summary tables that list each of the detected chemicals and includes statistics for each chemical by medium (<i>see</i> Example Table 1 attached and the example table that we gave to you on January 17, 1996). The data summary tables should provide summary information that effectively links the data to the COC selection process. The process of selecting COCs in this table should be clear. Appropriate background chemistry data can be summarized in this table. COCs selected by exceedance of biological benchmarks are also presented in the table</p> <p>If background chemistry data are presented in the data summary table, a complete list of all the background chemistry data (<i>see</i> Example Table 2) must be presented and should be referenced in the data summary table. A complete list of all the biological benchmarks used in the ERA must be presented (<i>see</i> Example Table 3) and should be referenced in Table 1.</p> <p>Other respective portions of the work plan [Addendum A (McAllister Point Landfill), Addendum B (Derektor Shipyard), and Addendum C (Old Fire Fighting Training Area)], should be revised to reflect changes made in the main section.</p>