



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1
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BOSTON, MASSACHUSETTS 02114-2023

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February 25, 2009

Winoma A. Johnson, P.E.
NAVFAC MIDLANT
Environmental Restoration OPHREV4
9742 Maryland Avenue
Bldg. N-26, Rm. 3208
Norfolk, VA 23511

Re: Draft Final Work Plan and Quality Assurance Project Plan for MRP Site 1,
Carr Point

Dear Ms. Johnson:

EPA concurs with the "Draft Final Work Plan and Quality Assurance Project Plan for MRP Site 1, Carr Point, Naval Station Newport, Portsmouth, Rhode Island," dated January 2009. Please note that EPA considers this Work Plan to meet the requirements of a Study Area Screening Evaluation (SASE) Work Plan, under the Federal Facilities Agreement (FFA), and expects that the final report on this effort will comply with the SASE Report requirements of Paragraph 31.7 of the FFA.

EPA had requested that the multi-increment samples planned for the firing points also be analyzed for SVOCs (see EPA's March 6, 2008 letter, comment 5, and EPA's September 4, 2008 letter, follow-up comment to RTC#5). The Draft Final Work Plan does include multi-increment samples from the 3 firing points for energetics, using Method 8330B, and EPA is willing to accept this data as indicative of potential risks from the former firing residuals. However, SVOC data would also be valuable here and there are likely efficiencies in evaluating SVOCs for the firing point samples at this SI stage. If the energetics analysis indicates a potential risk and these areas move into an RI stage, EPA will require SVOC sampling and analysis of these areas to fully evaluate potential exposures and risks.

In addition, EPA reiterates its concern with the appropriate screening level for the number of lead pellets per square foot. In the Navy's August 15, 2008 responses to EPA comments, response to comment 2 stated that the Navy would "report all numbers of pellets counted and use three to ten pellets per square foot as a grey area for possible concern to receptors until it is resolved." The Draft Final Work Plan does not reflect this agreement to report all pellets counted and use the three to ten range as a 'grey area'. EPA expects that the Draft SASE Report will include the information on all pellets counted.

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EPA accepts the schedule presented in Table 2-19 of the Draft Final Report and requests that the Navy strive to meet or exceed this schedule. Finally, please abide by the notifications listed in Section 2.9.2, as EPA would like to oversee some of the field sampling efforts.

If you have any questions, please contact me at (617) 918-1754 or at lombardo.ginny@epa.gov.

Sincerely,


Ginny Lombardo
Remedial Project Manager

cc: Paul Kulpa, RI DEM
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