



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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April 13, 2009

Winoma Johnson, P.E.  
NAVFAC MIDLANT (Code OPNBEV)  
Environmental Restoration  
Building Z-144, Room 109  
9742 Maryland Avenue  
Norfolk, VA 23511-3095

Re: Response to EPA Comments on the QAPP for Draft Phase 2 RI and BERA

Dear Ms. Johnson:

EPA reviewed the *Response to EPA Comments on the QAPP for Draft Phase 2 RI and BERA dated September 16, 2008 and March 4, 2009*. This response was submitted on March 17, 2009. Comments and responses are on the March 2008 *Draft Sampling and Analysis Plan for Phase 2 Remedial Investigation and Baseline Ecological Risk Assessment, Site 17, Gould Island*. In general, the responses have resolved many issues, and the flow chart on interpretation of ecological evaluations has been substantially improved.

EPA's original (March 2008) specific comment 7 recommended that soil boring samples in the southwest corner of the site, which includes the coal bed area, be analyzed for TAL metals and PAH in addition to TPH. The Navy argued that the additional analyses were not warranted just because of the presence of coal but also stated that "contaminants from the coal pile should actually be investigated as a part of the FUD Site." EPA accepted this response because of the deferral to the FUD Site investigation. In the previous response, the Navy commented that it "cannot speculate on sample locations for the FUD sites." EPA stated that without assurance that the soil will be more thoroughly evaluated in the future, there is a data gap in this area that must be addressed. EPA therefore repeated its recommendation for the metals and PAH analyses. In this most recent response, the Navy still does not confirm whether the FUDs program will address this area sufficiently. The Navy notes, however, that it has proposed limited sampling in this area to determine if it is a source of oil contamination that was found at Site 17 during the RI in 2005. This suggests that the soil will not be analyzed for TAL metals and PAHs, as originally recommended. If the Navy includes analyses for TAL metals and PAHs and EPA accepts the sampling plan, then concerns regarding this potential data gap will be addressed.

Specific comment 17 on the use of reference data requires clarification. EPA is concerned that the Jamestown reference area produced results in 2008 (for McAllister Point) that may have been impacted. As a result, it is possible to falsely dismiss site-related toxicity based on a confounded reference data. EPA is aware that most marine areas around the site are degraded. By accepting results from other reference areas, the Navy may inadvertently include stations that are impacted. Thus the reference data could include stations that are toxic, and thereby weaken the ability to discern toxic from non-toxic samples at Gould Island. EPA agreed that the Jamestown reference area is appropriate, and should represent ambient conditions. The utility of using historical reference data from previous tests is questionable since test conditions, organisms, and other factors should be

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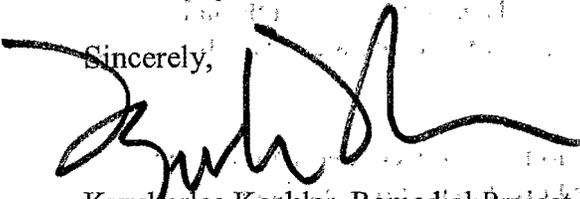
matched within a test. EPA recommends simply using the average results from the three stations in Jamestown done concurrently with the Gould Island samples and any results that have statistically lower survival or growth will be considered toxic.

EPA's original specific comment 20 (March 2008) sought rationale for collecting soil samples at the rigging platform area from a depth of 20 feet, noting that shallower samples could help characterize the depth of contamination from a spill in this area. In response to the most recent EPA comment (March 2009) indicating that it was still unclear if continuous samples would be collected for all soil borings, the Navy response refers to page 67 of 149 of the QAPP, which states that continuous split-barrel samples will be collected while soil borings are advanced. EPA understands that the Navy's intention is to collect continuous samples; however, the original comment is not resolved because the QAPP also states that split-barrel samples will be collected, visually inspected, and scanned for VOCs using a PID or FID. Unfortunately the screening results will not be related to the presence of PCBs. Using a PID or FID will not help in screening for PCBs because they are not volatile. It is noted that the four borings at the rigging area will also be analyzed for PAHs and metals - a PID or FID will not screen for metals either and only the lighter PAHs would be detected with the PID or FID. It does not appear that the instrument screening will provide much value in identifying a contaminated interval for the COCs. The rationale for the selected soil intervals is not adequate; there should be a greater focus on sampling in the shallower intervals unless the deeper soil is exposed and there is a reason for sampling it. Has the deeper soil been exposed?

EPA expressed that PCB contamination may not be sufficiently investigated if no intermediate samples are collected. Because the PCBs would have come from overland runoff from a spill, it makes sense to look for PCBs in shallower soil, so the sampling should focus on that. The only reason to look at very deep soil for contaminants from a surface spill would be if the collapsing soil at the rigging area exposed the deeper soil and allowed PCBs in shallower soil to migrate to the deeper intervals. A better approach to capture potential PCB contamination would be to collect samples from each boring in the rigging area from the same depth intervals as was proposed for the coal pile area boring (4 samples from within the upper four feet) with additional samples collected from the deeper soil intervals if warranted based on exposure of the deeper intervals. If the soil has collapsed extensively in the rigging area then more samples will likely be required. The screening protocol for collecting a deep interval sample for PCBs (or metals and PAHs) is not appropriate, as PID and FID detect VOCs rather than these target chemicals.

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

cc: Paul Kulpa, RIDEM, Providence, RI  
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