



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
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BOSTON, MASSACHUSETTS 02114-2023

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NAVSTA NEWPORT
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November 13, 2009

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

Re: **Draft Final Sampling and Analysis Plan for Phase 2 Remedial Investigation and Baseline Ecological Risk Assessment for Gould Island, Operable Unit 6**

Dear Ms. Johnson:

EPA reviewed the *draft final Sampling and Analysis Plan for Phase 2 Remedial Investigation and Baseline Ecological Risk Assessment (SAP)*, dated September 2009, for Gould Island in Jamestown, Rhode Island in light of its completeness, consistency, and technical accuracy. Detailed comments are provided in Attachment A.

The SAP text continues to refer to investigation of the former coal pile throughout the document even though the former coal pile is no longer a subject of the investigation. Similarly, the SAP refers to an investigation of the extent of fuel oil contamination even though the scope of this investigation is larger than that because it also includes analyses for PCBs and metals, contaminants related to the former coal pile. Please review the references to the former coal pile and delete those references that are no longer accurate. Edit the SAP text to broaden the references that refer only to a fuel oil investigation.

Please update the schedule throughout the SAP. The schedule for the Phase II RI work refers to a September 2008 start.

Please add a reference section.

I look forward to working with you and the Rhode Island Department of Environmental Management toward the cleanup of the Gould Island. Please do not hesitate to contact me at (617) 918-1385 should you have any questions or wish to arrange a meeting.

Sincerely,

Kimberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

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cc: Paul Kulpa, RIDEM, Providence, RI
Cornelia Mueller, NETC, Newport, RI
Ken Finkelstein, NOAA, Boston, MA
Todd Finlayson, Gannet Fleming, Orono, ME
Steven Parker, Tetra Tech-NUS, Wilmington, MA

ATTACHMENT A

- | <u>Page</u> | <u>Comment</u> |
|-------------|--|
| SC 2 | Although EPA accepted the response and no change to the SAP was needed, there is still an inconsistency in the Draft Final SAP. The final bullet under “Comments/Decisions” in the footnotes on page 20 (Worksheet #9) states: “Sediments, and soils that may be discharged to sediments, shall be analyzed for a full suite of contaminants using TAL/TCL analytical lists due to the need for calculating risk.” Worksheet 17 (page 94 of 154) states that sediment samples will be analyzed for PCBs, PAHs, and TAL metals. Please correct. |
| SC 3 | The response stated that Figure 10-2 would show the Northwest and Southeast Shoreline areas. The figure has not been changed but Figure 11-2 clearly shows these areas. For clarity, either add the labels to Figure 10-2 or refer to Figure 11-2 rather than 10-2 on page 27. |
| SC7 | Information submitted previously related to the scope of the investigation in the vicinity of the former coal pile indicated that PAHs and TAL metals would be added as analytes of concern. However, this SAP now includes PCBs, TAL metals, and TPH as analytes of concern, but not PAHs. Please include PAHs as analytes for the nine borings in the vicinity of the former coal pile (<i>see also</i> SC14 and SC16). |
| SC15 | EPA questioned the adequacy of the subsurface and intertidal sediment sample coverage and identified locations where subsurface data may be needed: |

Sample location	Results
Northeast Shoreline	
G32-SD304	Low MW PAHs and pyrene exceeded ER-M and were about three times the collocated surface concentration; PCBs exceeded the ER-M but were about three times less than the surface concentration.
Stillwater Basin	
G32-SD312	Many PAHs, some pesticides, and PCBs exceeded ER-M and collocated surface concentrations.
G32-SD316	Some pesticides and PCB exceeded ER-M and collocated surface sample locations. Many PAHs exceeded ER-L but none exceeded ER-M or collocated surface concentrations.
South Shoreline	
G32-SD311	Antimony exceeded the ER-M and was much higher than the collocated surface concentration.

As noted previously, the data suggest that there was significant contamination in subsurface sediment samples that may not be captured by collecting only surface samples. This data gap is not addressed in the SAP.

- SC20 The SAP does not explain how the appropriate deeper sampling interval will be identified when assessing the borings in the former rigging platform area. While EPA recognizes that resolution of this issue was postponed pending implementation of the field work, potential assessment options should be identified because agreement among the Navy, EPA, and RIDEM is required before a specific sample interval is selected for analysis. Please edit the SAP (e.g., second paragraph in Step 7.1 on page 50) to include the relevant assessment methodology options considered.
- SC 21 The response agreed that the six "locations to be determined" referred to on page 52, Section 7.3, should be collected from where the highest metal concentrations were historically discovered. This should be documented in the SAP.
- SC22 While the response is acceptable, it must be assumed that if elevated PCBs are detected, the depth of contamination will then be thoroughly characterized. This should be reflected in the SAP.
- SC 24 The exposure parameters and TRVs have been added to Appendix B, as noted in the response. The exposure parameters are acceptable but there are a couple items that need to be addressed with the TRVs. The NOAEL and LOAEL literature values, on which the TRVs will be based, are appropriate but the TRVs that will be used in the food chain model have not been selected and will need to be reviewed in the BERA. Further, no values for PAHs are presented. PAH TRVs will be needed in the BERA.
- SC 26 Proposed changes to Table 1 in Appendix A have not been incorporated.

New Comments

- p. 34, WS#11 The first paragraph under Step 2 incorrectly states that the coal bed area is a subject of the investigation.
- p. 48, WS#11 Regarding the first full paragraph that discusses the sample set of nine locations, please edit the second last paragraph to indicate that the samples are placed on 50 foot centers around the southwestern perimeter of the Navy property. They are no longer in a 50 foot by 50 foot grid as stated.
- p. 92, WS#16 Please update this table with the correct scheduling information.
- p. 93, WS#17 The first sentence incorrectly states that samples will be collected from the coal bed area. The coal bed area will no longer be sampled.
- p. 97, Table17-1 Borings GI-SB401 through 409 are intended to determine the extent of petroleum contamination, but they should also determine the extent of contamination associated with the former coal pile. Please edit the SAP to reflect this intent as well.