



TETRA TECH

C-NAVY-05-10-3628W

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Project Number G02574

Ms. Ginny Lombardo
U.S. EPA Region I
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Suite 100 (OSRR 07-3)
Boston, Massachusetts 02109-3912

Mr. Paul Kulpa
Rhode Island Department of Environmental Management
235 Promenade Street
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Reference: CLEAN Contract No. N62470-08-D-1001
Contract Task Order No. WE52

Subject: Responses to Comments, Final Technical Memorandum, Recreational Risk Assessment
Additional Investigation, MRP Site 1, Carr Point,
NAVSTA Newport, Portsmouth, Rhode Island

Dear Ms. Lombardo, Mr. Kulpa:

On behalf of Winoma Johnson, U.S. Navy NAVFAC, Tetra Tech NUS, Inc. (TtNUS) is providing responses to comments (RTCs) received from the U.S. Environmental Protection Agency (EPA) on the draft Technical Memorandum, Recreational Risk Evaluation, MRP Site 1, Carr Point, NAVSTA Newport, Rhode Island. No comments were received from Rhode Island Department of Environmental Management. The change noted in the RTCs has been incorporated into the document. The final Technical Memorandum is enclosed along with the RTCs.

If you have any questions regarding this material, please do not hesitate to contact me.

Very truly yours,

Thomas Campbell
Project Manager

TAC/lh

Encl.

- c: D. Barclift, NAVFAC Mid-Atlantic (1, w/encl.)
- W. Johnson, NAVFAC Mid-Atlantic (1, w/encl.)
- P. Golonka, Gannett Fleming (2, w/encl.)
- C. Mueller, NAVSTA (2, w/encl.)
- NAVSTA Administrative Record (c/o G. Wagner, TtNUS) (w/encl.)
- J. Trepanowski (w/encl.)
- G. Glenn, TtNUS (w/o encl.)
- L. Sinagoga, TtNUS (w/ encl.)
- File 2574-3.2 (w/o encl.) File 2574-8.0 (w/encl.)

**NAVY RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA)
COMMENTS DATED APRIL 13, 2010
DRAFT TECHNICAL MEMORANDUM, RECREATIONAL RISK ASSESSMENT (MARCH 29, 2010)
ADDITIONAL INVESTIGATION, MRP SITE 1, CARR POINT
NAVSTA NEWPORT, PORTSMOUTH, RHODE ISLAND**

Navy responses to the U.S. Environmental Protection Agency (EPA) comments on the Draft Technical Memorandum for Recreational Risk Evaluation at MRP, Site 1, Carr Point, NAVSTA Newport, Portsmouth, Rhode Island (March 29, 2010) are presented below. EPA's comments are presented first (in italics) followed by Navy's responses.

COMMENTS

EPA Comment 1:

Lead: It is appropriate to use the arithmetic mean lead concentrations to run the lead models per EPA protocol for lead. The model results show that the percentage of blood lead level exceeding 10 ug/dL is below EPA's cutoff level of 5%, indicating that lead exposures do not result in adverse health effects. However, EPA noted that the maximum concentration observed was 572 mg/kg, which is higher than EPA's acceptable lead level of 400 mg/kg. An action should be taken to address any areas where lead is detected at levels higher than 400 mg/kg. Since the sample location with this maximum lead value is CRP-SB09, which is also a location with elevated risk from PAHs, this location will be addressed by actions to address the elevated PAH risk.

Navy Response:

As indicated by the reviewer, it is appropriate to use the arithmetic mean lead concentration in the lead models. This is standard EPA guidance and risk management decisions are routinely made on the basis of the outcomes of the referenced lead models (again, which are based on the arithmetic mean concentration). Risk management decision-making on the basis of a single datum (i.e., the maximum detected concentration) would generally be at variance with the current guidance. However, as indicated by the reviewer, the lead concentrations exceeding 400 mg/kg are co-located with elevated PAH contamination. Therefore, this issue does not impact risk management decisions for the site. The Navy believes that it would be prudent, to include lead on the target analyte list for any future sampling conducted in the area.

EPA Comment 2:

COPC selection: Table 2-1 indicates in the footnote that the maximum detected concentration was used for selecting COPCs. This is consistent with EPA policy. The table also reports the average concentration. Please confirm that the maximum, not the average, was used for COPC selection.

Navy Response:

COPC selection was based on the maximum detected concentration.

EPA Comment 3:

RAFs for PAHs: The approach of using MADEP's relative absorption factors (RAFs) to assess risks from PAHs results in risks only slightly lower than EPA's approach of not using these RAFs. These RAFs were developed in 1994 with the use of route-to-route extrapolation, which is not an EPA preferred methodology. Therefore, although it is discussed in the Uncertainty Analysis section, EPA reiterates its position that it does not endorse this approach since the RAFs are not up-to-date and since PAHs have been found to be more toxic for early life exposure. The tech memo should clarify this point.

Navy Response:

A sentence will be added to the text indicating that the use of the RAFs is Massachusetts Department of Environmental Protection methodology, not EPA Region I endorsed risk assessment methodology.