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LETTER AND COMMENTS FROM U S EPA REGION 1 REGARDING DRAFT FINAL PHASE 2
REMEDIAL INVESTIGATION/ BASELINE ENVIRONMENTAL RISK ASSESSMENT SITE 17
GOULD ISLAND OPERABLE UNIT (OU) 6 NS NEWPORT RI
9/20/2011
U S EPA REGION 1



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION I

5 Post Office Square, Suite 100
Boston, MA 02109-3912

September 20, 2011

Ms. Maritza Montegross
NAVFAC MIDLANT (Code OPNEEV)
Environmental Restoration
Building Z-144, Room 109
9742 Maryland Avenue
Norfolk, VA 23511-3095

Re: Draft Final Phase 2 RI/BERA for Site 17, Gould Island (Operable Unit 6)

Dear Ms. Montegross:

Thank you for the opportunity to review the *Draft Final Phase 2 RI/BERA for Site 17, Gould Island* dated August 2011. The Phase 2 RI/BERA was conducted to refine the nature and extent of contamination in the site soil and marine sediment and to document and interpret exposure data for the ecological risk assessment. Detailed comments are provided in Attachment A.

The conclusion and recommendations of human health non-cancer and cancer risks in the Executive Summary on pages E-4, E-5, E-6 are not consistent with the summary on pages 1-22 and 1-23. The recommendations do not include exposures to cadmium in subsurface soil (unacceptable non-cancer risks) or PAHs and PCBs exposure in shallow groundwater for construction workers. Please revise the Executive Summary to accurately reflect the findings from the risk assessment in the 2006 RI.

Table 6-25 from the Draft Phase 2 RI (juvenile production for surviving female endpoint) was omitted from the Draft Final Phase 2 RI. The Table of Contents shows that this table should be Table 6-27. Please insert the correct Table 6-27.

The Draft Final RI discusses uncertainty noting that there are several inconsistencies and concerns with the results of the toxicity testing. As a result of team discussions, some samples that would normally be considered non-toxic were considered toxic for the purposes of the uncertainty analysis. This analysis changed some of the NOEC and LOEC values. However, it should be noted that the results of the uncertainty analysis were not carried through to the Draft Final RI. None of the figures presenting the results incorporates the uncertainty analysis and none of these figures reflects the contaminant concentrations detected in earlier sampling rounds. This should be considered as this project moves forward.

I look forward to working with you and the Rhode Island Department of Environmental Management toward the cleanup of the Gould Island. Please contact me at (617) 918-1385 should you have any questions.

Sincerely,



Kymberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: Pam Crump, RIDEM, Providence, RI
Deb Moore, NETC, Newport, RI
Chau Vu, USEPA, Boston, MA
Ken Finkelstein, NOAA, Boston, MA
Steven Parker, Tetra Tech-NUS, Wilmington, MA

ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. E-6	Regarding risks from shellfish consumption, PCBs are also major risk contributors in addition to arsenic, which was considered background. The FS must include remedial alternatives to address risks from this pathway.
p. 1-19, §1.5.5, ¶3	EPA agrees with the last sentence. Why were additional data not collected during the Phase 2 RI sediment sampling to determine the 'limits of contaminants to the north'?
p. 1-22	Please provide the reference and date for the HHRA from the Phase 1 RI for this section.
p. 2-6, §2.2.1.1, ¶3	In the first sentence, change "for cohesion testing" to "for erodibility testing."
p. 5-1, §5.0, ¶3	In the third sentence, change "fate and of" to "fate and transport of."
p. 5-6, §5.4, ¶3	It is unlikely that bedload occurs in the Stillwater area? Please reword this sentence to remove reference to bedload transport and define what is meant by down-current.
p. 5-7, §5.5, ¶3	Please reword the third sentence. It implies that wave action will result in burial which is unlikely.
p. 5-12, §5.6, ¶2	EPA agrees with the statement in the last sentence that 'if the breakwater and shoreline improvements are not maintained in the long-term, the fill areas at the north end of the island will sustain continued erosion.'
p. 4-46, §4.3.7	Regarding the last sentence in the first paragraph, EPA notes that sample locations 308E and 308F had PCB concentrations greater than 10 mg/kg and 15 mg/kg respectively so PCB impacts to biota collected at the northwestern shoreline cannot be dismissed as the text suggests.
p. 6-14, §6.3.4.2	Please reword the sentence at the top of the page to clarify its meaning.
p. 7-13	Please discuss whether biota contamination is an issue at the Site. It is unclear where the reference locations for clam/mussel and crab collection are and how background is defined for shellfish, which can migrate. Please also refer to tables 4-23 through 4-31 and Figure 2-2 for biota sampling locations.

- p. 7-16 Update "mid 2011" to reflect when the sediment transport model will be available for review.
- Tables 4-23 to 4-31 & Figure 2-2 It is not clear from these tables where the background clam/mussel and crab samples are located. Please provide. From the tables and the text, it is also unclear how many background sample locations are included. Since contaminants found in shellfish are proposed for exclusion because of high background concentrations, further detail and discussion need to be provided.
- Table 6-27 Please replace this table with the correct Table 6-27 (juvenile production for surviving female endpoint).
- Table 6-31 Please correct the second note. The NOECs and LOECs are determined in Tables 6-19 to 6-30.
- Figure E-1 This figure is simplistic and does not necessarily reflect toxicity impacts for the site. EPA recommends that this figure be deleted. Other figures present the findings more appropriately, albeit not in summary form. If this figure is retained, it must be edited to include the PCB excavation locations presented in Figure 1-3 and must note that there were PCBs, PAHs, and metals in sediment and low to no risk north of the former dock.
- Figure 1-3 This figure is an interesting addition to the draft final RI. It shows multiple locations where PCB excavations were conducted around the site. It is noteworthy that several of these locations are located immediately adjacent to the northeastern shoreline and several others are located along roadways that drain down to the former dock area. Elevated PCB concentrations have been detected in the sediment adjacent to the shoreline excavations and in the vicinity of the former dock. EPA remains concerned about this general area.
- Figure 6-3A There are several locations where two overlapping symbols are present but only one sample identifier is associated with those locations. The two symbols apparently indicate that two samples have been collected. Please add the missing sample numbers (e.g., 304F, 317, 402, and 413).
- Figure 6-3B Please explain the difference between x and xx presented in the data boxes.
- Figure 7-1 This figure does not reflect the toxicity impacts for the site and therefore EPA recommends that it be deleted. Other figures in this RI present the findings more appropriately, albeit not in summary form. If this figure is retained, it must include the PCB excavation locations presented in Figure 1-3 and it must note that there were PCBs, PAHs, and metals in sediment and low to no risk north of the former dock.