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EMAIL REGARDING U S FISH AND WILDLIFE COMMENTS ON DRAFT FINAL
SUPPLEMENTAL REMEDIAL INVESTIGATION NETC NEWPORT RI
6/21/2011
U S FISH AND WILDLIFE

Ropp, Jim

From: Montegross, Maritza L CIV NAVFAC MIDLANT, IPTNE <maritza.montegross@navy.mil>
Sent: Tuesday, June 21, 2011 9:14 AM
To: Ropp, Jim
Subject: FW: NUSC Draft Final Supplemental RI - May 2011
Signed By: maritza.montegross@navy.mil

Hi Jim:

Just forwarding you another email from Ken Munney...I was a little confused because it appeared he forwarded me two emails, but I only got one. The one email I got looks like two emails because there's one sent at 2:40pm and another forwarded at 2:38. This "double" email from Ken Munney was in response to Ginny's email of 6/15 that she sent us.
R/Maritza

-----Original Message-----

From: [Kenneth Munney@fws.gov](mailto:Kenneth_Munney@fws.gov) [mailto:Kenneth_Munney@fws.gov]
Sent: Thursday, June 16, 2011 2:40 PM
To: Montegross, Maritza L CIV NAVFAC MIDLANT, IPTNE
Subject: Fw: NUSC Draft Final Supplemental RI - May 2011

Maritza -

Please see below

Ken Munney
USFWS
Environmental Contaminants
70 Commercial St - Suite 300
Concord, NH 03301
603-223-2541, ext.19
FAX 603-223-0104
Kenneth_Munney@fws.gov

----- Forwarded by Kenneth Munney/R5/FWS/DOI on 06/16/2011 02:38 PM -----

Kenneth Munney/R5/FWS/DOI

06/16/2011 02:11 PM

To

maritza.montegross@navy.mil

cc

Lombardo.Ginny@epamail.epa.gov, hoskins.bart@epamail.epa.gov

Subject

Fw: NUSC Draft Final Supplemental RI - May 2011

Maritza -

We concur with EPA statements regarding ecological risk assessment issues. We have conferred with EPA on ERA issues and are in agreement with the proposed path forward relative to stream and pond sediment issues and PRG development.

We look forward to further development of these issues in the FS.

Ken Munney
USFWS
Environmental Contaminants
70 Commercial St - Suite 300
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----- Forwarded by Kenneth Munney/R5/FWS/DOI on 06/16/2011 02:05 PM -----

Lombardo.Ginny@epamail.epa.gov

06/15/2011 03:47 PM

To

maritza.montegross@navy.mil

cc

Jim.Ropp@tetrattech.com, gary.jablonski@DEM.RI.GOV, stephen.parker@ttnus.com, deborah.j.moore@navy.mil, steinberg@mabbett.com, kemp@mabbett.com, Kenneth_Munney@fws.gov, Hoskins.Bart@epamail.epa.gov, Vu.Chau@epamail.epa.gov

Subject

NUSC Draft Final Supplemental RI - May 2011

Maritza-

A couple of minor comments on the Draft Final Supplemental RI Report:

- In response to EPA Specific Comment #22, text was added in Section 6.5 to include a qualitative discussion of the background risk associated with B(a)P and arsenic in sediment. Please add a concluding sentence indicating that since the ILCRs from arsenic and B(a)P in sediment at the site are similar to background ILCRs from these compounds, it is reasonable to eliminate arsenic and B(a)P as sediment COCs.
- Table 4-10: This table lists benzo(b)fluoranthene but should apparently list benzo(k)fluoranthene. See Navy's response to EPA Specific Comment #20 for the Draft SRI. The same comment applies to Table 6-6.

And to clarify EPA's position on next steps on addressing ecological risks:

1. There appears to be a significant lead source to the on-site stream, which may reflect leaching from contaminated soil adjacent to the stream. The stream itself flows over exposed rock for much of its length, and contains little soft sediments, so it is possible that sediment remediation will not be practicable. EPA expects that that, in the FS, the Navy will consider the potential for lead to be carried through the stream to the pond with potential adverse effects, and address the underlying source areas that are creating this potential hazard in the stream. This risk is not explicitly described in the RI documents, although lead has been retained as a COC in both stream and pond sediments.
2. It is EPA's understanding that as we move into the FS stage, the finalizing of PRGs and evaluation of appropriate remedial actions will be based on the observed toxicity in all three pond samples, and lack of toxicity in the reference area. It is important to note that, historically, toxic sediments have been the primary driver of site clean-up actions related to ecological risk at Navy sites in Region I. With no non-toxic site samples available, it is recommended that, in the FS, the Navy develop PRGs based on a geometric mean of reference (as the NOEC) and lowest on-site (as the LOEC) sediment concentrations for each COC, as well as with a cumulative approach using PEC Quotients.

Please let me know if Navy will submit replacement pages to address the minor comments above, In addition, confirm that Navy concurs with the next steps on ecological risks. EPA understands that the eco risk next steps will be addressed in the FS and there does not need to be changes to the SRI to address these comments. Upon receipt of the replacement pages, EPA will concur with the SRI.

Finally, please update us on the status of the revised Draft FS for NUSC. Thanks.

Ginny Lombardo
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