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LETTER AND U S EPA COMMENTS TO DRAFT FINAL ENGINEERING EVALUATION/COST
ANALYSIS CARR POINT SITE 1 NS NEWPORT RI

5/9/2012
U S EPA

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Subject: Re: Draft Final MRP Site 1, Carr Point EE/CA
Date: Wednesday, May 09, 2012 11:36:14 AM

Maritza and Pam-

I have completed a preliminary review of the Draft Final Carr Point EE/CA and there are a few things I would like to 'tee up' for consideration and discussion at next week's RPM meeting. I think there are some major improvements that Navy offers in the Draft Final EE/CA that get us much closer to where EPA and RIDEM were looking to get to when we commented on the Draft and held comment resolution discussions on the draft. The Navy is now proposing to remove soils down to 2 feet if in exceedance of their proposed B(a)P equivalent I/C DEC goal, which gets us away from the 14-day exposure limitation, which I think is a great step towards making sure this removal action meets our future remedial goals. I think the following points need to be resolved though before Navy, EPA and RIDEM can reach consensus on this proposed removal action:

- I recognize that the Navy recommends that the carcinogenic PAHs be handled (from a risk assessment and PRG perspective) as a group. However, the 'bottom line' is that the RIDEM regulations will be an ARAR for this removal action and for future remedial actions and RIDEM has promulgated numerical standards for the individual PAHs, so Navy will be required to demonstrate compliance with those standards. So, since Navy has come as far as agreeing to remove soils to comply with the calculated B(a)P equivalent I/C DEC standard, would the Navy agree to compare confirmatory sample data to the RIDEM individual I/C DEC standards for all identified COCs (i.e., including metals) and utilize that comparison to make decisions on additional removal down to 2 feet? As such, Navy would excavate the area delineated by the surface soil data as above levels of concerns down to 1 foot. Navy would take confirmatory samples at the bottom of the excavation and sidewalls and sample soil for all COCs (PAHs and metals) and compare the results to the RIDEM I/C DEC criteria. If the RIDEM I/C DEC criteria are exceeded, the Navy would excavate an additional foot of soil down to 2 feet, where necessary.

- RIDEM regulations, Section 3.34, defines Industrial/Commercial to include outdoor recreational areas with restrictions in place to limit potential exposure. RIDEM regs require that I/C standards be met to a depth of 2 feet. Navy has indicated that LUCs will be put in place to restrict the recreational uses at this site, including restrictions on digging and intrusive activities. This then seems consistent with the intent of the RIDEM regulations that this site would need only to comply with the I/C DEC standards. So, if the removal is done consistent with the above bullet and the LUCs are put in place, this area should likely then be adequately addressed with respect to soil contamination once we get to the remedial action (i.e., we won't have to go back and dig up anything else in this area).

- I looked at the leachability data presented in the SASE (Section 6.2.2 and Table 6-6). The 3 exceedances of RIDEM's soil leachability criteria in subsurface soil were all within the other Operable Unit - the Former Carr Point Storage Area - so will be addressed in the RI for that OU. So, based on my review, there does not appear to be any exceedances of RIDEM leachability criteria within the boundaries of the planned removal action area in subsurface soils. I'd ask others to confirm that through their own review. So, if we remove the surface soils down to 2 feet, as necessary, to comply with RIDEM I/C DEC criteria and also compare the confirmatory data to RIDEM's leachability criteria for the additional excavation decision, Navy should also be able to demonstrate compliance with leachability standards within this area once we get to the remedial action.

- I would also like folks to consider the incremental sampling methodology (ISM) for the confirmation sampling program and possibly, as appropriate, for future RI sampling efforts. Navy used multi-increment sampling (MIS - same thing as ISM) for the energetics at the firing points, as this is the

required sampling approach defined by the analytical method for energetics. However, ISM is now being touted as a more reliable sampling approach for other constituents. The attached link is to a recent (Feb 2012) ITRC guidance document on ISM: <http://www.itrcweb.org/ism-1/> This sampling approach offers numerous advantages over traditional discrete sampling and may be appropriate depending on the goals of the sampling program and whether we work together and agree to defined decision units.

I request that you consider these thoughts and recommendations and be prepared to discuss this at next week's RPM meeting. I know there is currently only very limited time on the agenda for this site. If you believe additional time is needed, please adjust the agenda as appropriate. Thanks.

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Date: 05/04/2012 09:57 AM
Subject: Draft Final MRP Site 1, Carr Point EE/CA

Hello All,

Please see attached the draft final EE/CA for MRP Site 1, Carr Point, Recreational Vehicle Camping Park Area. Comments discussed on the December 14, 2011 conference call and follow up comments from RIDEM received on December 14, 2011 have been incorporated into this document. Any comments on the draft final EE/CA are requested by June 1, 2012.

Regards,

Tom Campbell

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