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LETTER AND U S EPA REGION I RESPONSE TO U S NAVY RESPONSE TO COMMENTS  
ON DRAFT FINAL PHASE 2 REMEDIAL INVESTIGATION/BERA FOR GOULD ISLAND NS  
NEWPORT RI  
5/23/2012  
U S EPA REGION I



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION I**  
5 Post Office Square, Suite 100  
Boston, MA 02109-3912

May 23, 2012

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

Re: Responses to EPA's Comments on the Draft Final Phase 2 RI/BERA for Gould Island

Dear Ms. Montegross:

Thank you for the opportunity to review the April 24, 2012 responses to our September 20, 2011 letter on the *Draft Final Phase 2 RI/BERA for Site 17, Gould Island*, dated August 2011. The report refines the nature and extent of contamination in the site soil and marine sediment and documents and interprets exposure data for the ecological risk assessment.

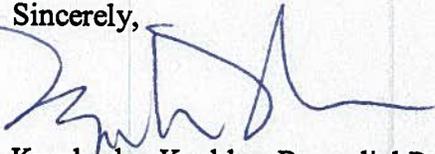
GC3: While Navy modified the discussion of the uncertainty analysis and added the appropriate discussion points as acknowledged in the original comment, the reclassification of some samples as toxic by the project team resulted in different NOECs and LOECs for three primary contaminants of concern: PCB congeners, lead, and ERMQ. This was acknowledged only in the uncertainty discussion while the remainder of the RI, including the figures depicting exceedances of NOECs and LOECs, did not address the results of the sample reclassification. As stated in EPA's original comment the significant uncertainty associated with the toxicity test results warrants consideration when PRGs are established. A more conservative approach should be considered because of the uncertainty and significant variability of the toxicity test results.

SC9 (p. 4-46, §4.3.7): For clarification, the last sentence in the first paragraph of the Draft Final RI states that "PCBs do not appear to have significantly impacted the sediments in this area." However, sample locations 308E and 308F on the northwestern shoreline had PCB concentrations greater than 10 mg/kg and 15 mg/kg respectively, which is about an order of magnitude greater than the sediment PRG and contrary to the referenced statement. Therefore, the referenced sentence needs to be deleted or revised. Furthermore, despite the results from the biota data, it appears that PCB impacts to biota at the northwestern shoreline should not be dismissed without acknowledging that the biota samples collected may not reflect the true impacts from the PCB contamination present along the northwestern shoreline

because of the very limited amount of biota data collected that may not represent the area population.

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.

Sincerely,



**Kimberlee Keckler, Remedial Project Manager  
Federal Facilities Superfund Section**

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