



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
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NAVSTA NEWPORT RI
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received
07-07-03

July 1, 2003

Franco LaGreca
U.S. Department of the Navy
Naval Facilities Engineering Command
Northern Division
10 Industrial Highway
Code 1823, Mail Stop 82
Lester, PA 19113-2090

Re: Work Plan for Study Area Screening Evaluation, NUSC Disposal Area

Dear Mr. LaGreca:

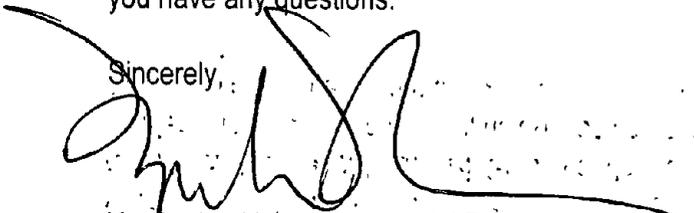
EPA reviewed the *Work Plan for Study Area Screening Evaluation, NUSC Disposal Area, Naval Education and Training Center Report*: June 6, 2003. Detailed comments are provided in Attachment A.

The screening Project Action Limits (PALs) developed for soil are the *industrial* EPA Region 9 Preliminary Remediation Goals (PRGs). According to the EPA Region 9 PRG Users Guide, it is generally *not* recommended that *industrial* PRGs be used for screening sites unless they are used in conjunction with residential values. Additionally, risk-based screening concentrations for non-carcinogens have not been adjusted to reflect a hazard index of 0.1, which would account for exposure to multiple noncarcinogenic contaminants on the site. In summary, the PALs presented are not the most conservative screening concentrations that should be used in this SASE. Please use the residential PRGs for the PALs and adjust the noncarcinogenic PRGs to reflect an HI of 0.1.

Section 5.2, Human Health Risk Evaluation, discusses the possibility of eliminating chemicals as Contaminants of Potential Concern (COPC) based on a comparison to background concentrations. Comparison of background concentrations of chemicals and potential elimination of COPCs based on this comparison to background must be performed in accordance with *Role of Background in the CERCLA Cleanup Program*, USEPA, April, 2002, OSWER 9285.6-07P.

I look forward to working with you and the Rhode Island Department of Environmental Management toward the cleanup of the NUSC Disposal Area. 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

Toll Free • 1-888-372-7341

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- chlordanes
- Please check the presented values and revise as necessary.

Table 4-1D The Project Action Limits for the following chemicals could not be verified:

- antimony
- barium
- cadmium
- cobalt
- lead
- manganese
- selenium

Please check the presented values and revise as necessary.

Table 4-3C The Project Action Limits for heptachlor and heptachlor epoxide could not be verified. Please check the presented values and revise as necessary.

Table 4-4A Footnote #4 is incorrect. It should be: Calculated by multiplying the acute LOEL by 0.01 to estimate a chronic NOEL.

Table 4-4C The Project Action Limits for endrin and endrin ketone could not be verified. Please check the presented values and revise as necessary.

Table 4-4D The Project Action Limits for cadmium and silver could not be verified. Please check the presented values and revise as necessary.

p. 4-35, §4.6 The text in this section indicates that USEPA Region I Tier III equivalent data validation will be conducted on analytical data resulting from the sampling effort. However, the text of Section 4.10.2 indicates that USEPA Region I Tier II data validation will be performed. Please review these two sections and ensure consistency in the level of data validation proposed.

p. 5-3, §5.2 The risk-based screening concentrations proposed for use in the resulting human health risk assessments are the USEPA Region IX industrial PRGs. The industrial PRGs are not the most appropriately conservative screening concentrations and must be used in conjunction with the residential PRGs. Residential PRGs should be used to eliminate Contaminants of Potential Concern in the human health risk assessment.

p. 5-4, §5.3 It is not clear from the text of this section that maximum and average contaminant concentrations from data collected during this effort will be compared to ecological screening benchmarks for each media present (soil, sediment and surface water). Please confirm.

ATTACHMENT A

| <u>Page</u> | <u>Comment</u> |
|--------------|--|
| p. 4-6, §4.3 | Please list the contaminants that are discussed in the last sentence on this page. In other words, specifically list (or bold those chemicals in the accompanying tables) that have actual detection limits that fall above the targets. In addition, explain how the data for these chemicals will be handled in the data evaluation and risk assessment process. |
| Table 4-1A | <p>There are discrepancies in the values presented for the EPA Region IX <i>industrial</i> PRGs for the following chemicals:</p> <ul style="list-style-type: none">• bromomethane• MTBE (PRG published, none listed)• 1,2-dichloropropane• 1,3-dichloropropane• isopropylbenzene• ethylene dibromide (1,2-dibromoethane). <p>Please check the presented values and revise as necessary.</p> |
| Table 4-1B | <p>There are discrepancies in the values presented for the EPA Region IX <i>industrial</i> PRGs for the following chemicals:</p> <ul style="list-style-type: none">• 2,2-oxybis(1-chloropropane)• acetophenone• hexachloroethane• 2,4-dichlorophenol• 4-chloroaniline• 3,3-dichlorobenzidine <p>Please check the presented values and revise as necessary.</p> |
| Table 4-1C | <p>The Project Action Limits for the following chemicals could not be verified:</p> <ul style="list-style-type: none">• BHCs• heptachlor• aldrin• heptachlor epoxide• Endosulfan I• Endosulfan II• Endosulfan Sulfate• Endrin• Endrin ketone• Endrin aldehyde• DDD• DDE• DDT |

Attachment

cc: Paul Kulpa, RIDEM, Providence, RI
Kathy Marley, NETC, Newport, RI
Jennifer Stump, Gannet Fleming, Harrisburg, PA