



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

June 14, 1999

James Shafer, Remedial Project Manager
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: Comments on the Human Health Risk Assessment Report for Recreational Use at the Old Fire Fighting Training Area/Katy Field at Naval Station Newport, Newport, Rhode Island

Dear Mr. Shafer:

EPA reviewed the "Human Health Risk Assessment Report for Recreational Use Old Fire Fighting Training Area/Katy Field," dated May 1999. EPA reviewed the report for technical content, completeness, compliance with federal regulations and guidance for human health risk assessment, and agreements made during the January 13, 1999 meeting. Detailed comments are provided in Attachment A.

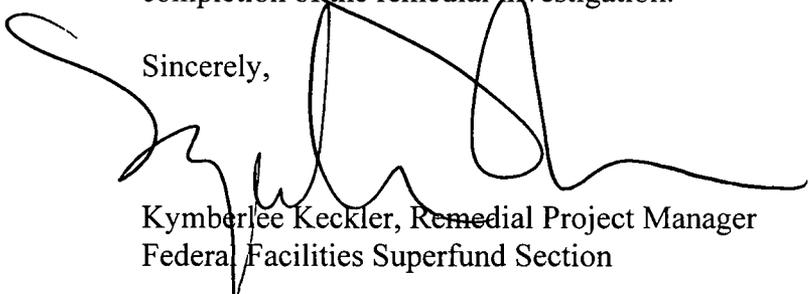
The raw data used in the risk assessment was not provided in the document. Only data usability worksheets are provided. The sampling results and detection limits for the data used in the assessment should be provided in an appendix. The raw data are needed to verify the exposure point concentrations. Also, it is unclear if data from previous sampling efforts in 1990, 1991 and 1993/1994 were used. The sampling dates should be provided with the data, and it should be clarified in the text if analyses from previous sampling events were included in this assessment. Justification for the use of previous samples should also be provided as necessary.

In the risk assessment, inorganic concentrations are compared to background concentrations (but these are not used for screening inorganics). Minimal information is provided in the report regarding the background concentrations. Because this information is not provided in a supporting document, detailed information regarding the selection process for background samples, the location and past histories of the areas of selected background samples, and a detailed explanation of the rationale for excluding one of the background samples should be provided to ensure that the analysis of background concentrations was valid. The values for the background samples and their detection limits should also be provided in an appendix. Currently, only detected ranges are provided.

I look forward to working with you and the Rhode Island Department of Environmental Management toward the cleanup of the Old Fire Fighting Training Area. Please contact me at (617) 918-1385 to arrange a meeting to discuss the two additional exposure scenarios (*i.e.*,

residential and the shoreline visitor) that were briefly discussed on January 13, 1999 and completion of the remedial investigation.

Sincerely,



Kimberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: Paul Kulpa, RIDEM, Providence, RI
Melissa Griffin, NETC, Newport, RI
Cindy Hanna, USEPA, Boston, MA
Jennifer Stump, Gannet Fleming, Harrisburg, PA
Steven Parker, Tetra Tech-NUS, Wilmington, MA
Mary Philcox, URI, Portsmouth, RI
David Egan, TAG recipient, East Greenwich, RI

ATTACHMENT A

| <u>Page</u> | <u>Comment</u> |
|------------------------|---|
| p. 8-4, §8.3, Bullet 7 | This section discusses the uncertainty in the evaluation of arsenic in the exposure assessment. It is stated that evaluating arsenic as a noncarcinogen would be more appropriate. This sentence is not accurate. While there are uncertainties associated with evaluating arsenic as a carcinogen, consideration of arsenic as a carcinogen is the accepted mode of evaluation by EPA based on assessment of the multiple studies available on arsenic. Please revise this sentence. |
| Table 3-1 | This table presents the selection of exposure pathways. This table should include potential pathways that are not evaluated and the rationale for exclusion. For example, the adult was not evaluated for the sediment medium as was agreed upon at the January 13, 1999 meeting. This table should be revised to encompass all potential pathways. |
| Table 4-1 | This table presents the occurrence, distribution and selection of chemicals of potential concern in surface soil. Total 2,3,7,8-TCDD equivalence is shown in the table and a calculated minimum, maximum, and the location of the maximum are provided. The report does not explain the methodology used to calculate total 2,3,7,8-TCDD. It is unclear if the maximum concentration was determined based on calculations per sample location or across sample locations. The methodology behind the treatment of dioxins in the data management portion of the risk assessment should be provided in the text. Factors used in the calculation of the total 2,3,7,8-TCDD equivalences must be provided in the document. Any assumptions that were made should be discussed in the uncertainty section. |
| Table 4-3 | This table presents the representative concentration and statistical distribution of chemicals of potential concern in surface soil. The methodology for the treatment of dioxins in the statistical analysis in the report is not included in the document. The text should state whether the statistical analysis for dioxins was performed on the total 2,3,7,8-TCDD equivalent values or on each individual congener. |