



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

N62661 AR 001267
NAVSTA NEWPORT RI
5090 3a

August 30, 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

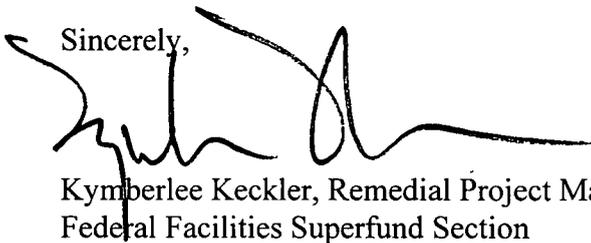
Re: TECHNICAL REVIEW COMMENTS ON THE NAVY RESPONSES TO EPA
COMMENTS ON THE DRAFT HUMAN HEALTH RISK ASSESSMENT REPORT
FOR RECREATIONAL USE, OLD FIRE FIGHTING TRAINING AREA/KATY FIELD

Dear Mr. Shafer:

EPA reviewed the *Navy Response to Comments on the Draft Human Health Risk Assessment Report for Recreational Use, Old Fire Fighting Training Area/Katy Field* dated August 1999. The responses appropriately address the EPA comments, except for the response regarding the dioxin equivalence factors. I understand EPA's earlier comments will be addressed when the Remedial Investigation is completed. Detailed comments are provided in Attachment A.

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 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

Attachment

cc: Paul Kulpa, RIDEM, Providence, RI
Melissa Griffin, NETC, Newport, RI
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>
Table 4-1	<p>In its original comment, EPA requested that an explanation of the methodology used to calculate the total 2,3,7,8-TCDD equivalent concentrations, as presented in Table 4-1, be included in the text. In the response to this comment, the methodology was supplied. The response described that the total 2,3,7,8-TCDD equivalents were calculated as the sum of the concentration times the TEF for each positive detected isomer PLUS one-half of the concentration times the TEF for each non-detect isomer.</p> <p>Total 2,3,7,8-TCDD equivalent concentrations, as presented in Table A of the attachments to this response to comments, were verified in this review. Upon checking these calculations, it was determined that the total 2,3,7,8-TCDD equivalent concentrations were calculated as the sum of the concentration times the TEF for each positive detected isomer only. The non-detected isomers were not input into the calculations at a concentration equal to one-half the sample quantitation limit times the associated TEF. It appears that the Total 2,3,7,8-TCDD equivalent concentrations will need to be re-calculated to correspond with the methodology for obtaining 2,3,7,8-TCDD equivalents, which is stated in this response.</p>