

N5278-3.1

(received via email)
7/13/00

July 12, 2000

James Shafer, Remedial Project Manager
U.S. Department of the Navy
Northern Division
Naval Facilities Engineering Command
10 Industrial Highway
Code 1823-Mail Stop 82
Lester, PA 19113-2090

0054331

RE: Old Fire Fighter Training Area, Human Health Risk Assessment Exposure Parameters,
Naval Education and Training Center, Newport, Rhode Island

Dear Mr. Shafer,

The State of Rhode Island Department of Environmental Management, Office of Waste Management has reviewed the Old Fire Fighter Training Area Human Health Risk Assessment Exposure Parameters letter dated 23 June 2000. Attached are comments generated as a result of this review. If the Navy has any questions concerning the above, please contact this Office at (401) 222-2797 ext. 7111.

Sincerely,

Paul Kulpa, Project Manager
Office of Waste Management
cc: Warren S. Angell, DEM OWM

Kymerlee Keckler, EPA Region I
Melissa Griffen, NETC

offtahr

**Comments on Human Health Risk Assessment
Exposure Parameters Tables.**

**1. Shoreline Visitor,
Tables 1-4.**

As stated in correspondence dated 18 June 1998, recreational areas in this state are typically evaluated using an unrestricted exposure scenario. The submitted risk assessment report evaluates a series of restricted recreational exposure scenarios. As an illustration, the shoreline visitor scenario utilizes an exposure period of twelve days per year. As such, this limited exposure scenario used in the table would require the Navy to restrict access to the shoreline to twelve days per year to meet the exposure frequency noted in the aforementioned example. It is the State's understanding that the Navy does not intend to restrict access to the shoreline. Therefore, the exposure frequency should reflect an unrestricted scenario that is 350 days per year.

**2. Shoreline Visitor,
Table 1-4.**

The ingestion rate for the shoreline visitor should be adjusted to 200 mg/d.

**3. Shoreline Visitor,
Tables 1-4.**

The evaluation is currently limited to use of the shoreline by a child. Please include an adult scenario.

**4. Shoreline Visitor, Recreational Surface Soils, Residential Shoreline Sediment
Residential Soils
Tables 2,4,6,9,12,15,17,19,22**

Dermal area is hands, arms, feet, legs, and head. Please modify the tables accordingly.

**5. Recreational Surface Soil,
Tables 5-13.**

As previously noted recreational areas in this state are typically evaluated using an unrestricted exposure scenario. The exposure frequency for the recreational visitor in this table is 48 days per year. This would require the Navy to restrict access to the site to 48 days per year. It is the State's understanding that the Navy wants unrestricted access to the site. Therefore, the exposure frequency should be changed to 350 days per year.

**6. Recreational Surface Soils,
Tables 5-13.**

The exposure medium identified in this scenario is surface soils. Please be advised that surface soils under this scenario are considered to extend to the water table. Accordingly, the concentration of contaminants should be reflective of this requirement.

**7. Recreational Surface/Subsurface Soils,
Tables 11-23.**

Exposure duration for the adult is 30 years for the inhalation pathway. Please modify the table accordingly.

**8. Residential Shoreline Sediment
Tables 14-17.**

The exposure frequency for this scenario is 350 days per year. Please modify the tables accordingly.

**9. Residential Shoreline Sediment,
Tables 14-17.**

The ingestion rate for the child is 200 mg/d. Please modify the tables accordingly.

**10. Residential Shoreline Sediment
Tables 14-17.**

Exposure duration for adults is 30 years for the inhalation pathway. Please modify the tables accordingly.

**11. Residential Onshore Soils,
Tables 18-23.**

The exposure frequency for this scenario is 350 days per year. Please adjust the table accordingly.

**12. Recreational/Residential
Tables 5-23.**

Exposure duration for inhalation scenario is 30 years. Please change the tables accordingly.

**13. Recreational/Residential
Tables 5-23.**

Exposure frequency for inhalation scenario is 350 days. Please change the tables accordingly.

**14. Industrial/Commercial Worker,
Tables 24-26.**

Exposure frequency is 250 d/yr. Please modify the report accordingly.

**15. Industrial/Commercial Worker,
Tables 24-26.**

Typical construction jobs take more than one year. The exposure duration should be two years. Please modify the report accordingly

**16. Shellfish Ingestion,
Tables 30-32.**

Ingestion rates for adults is 15.6 g/day, children is 4 g/day and the subsistence fisherman is 36 g/day. Please change the tables accordingly.