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

April 20, 2006

Curtis Frye
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: Conceptual Site Model for the Old Fire Fighting Training Area

Dear Mr. Frye:

Thank you for the opportunity to review the Conceptual Site Model for Site 09, Old Fire Fighting Training Area, dated March 17, 2006. Detailed comments are provided in Attachment A based upon EPA's review of this document and the discussions held with the Tiger Team members on April 13, 2006.

A human health risk assessment that evaluates a commercial/industrial scenario (soil and groundwater exposure) should be included so that remedial action objectives based on this exposure scenario can be evaluated in an FS. Additionally, the Navy should officially inform EPA of its plans for the future use of the OFFTA parcel and explain how it will be enforced.

Please outline the Navy's commitment to conduct additional investigations to locate and remove buried structures and take additional samples around any such structures in the upcoming removal action work plan. This investigation should sufficiently address EPA's concern regarding unidentified residual contamination.

The revised FS should incorporate the sediment monitoring data that have been collected. The results of a comparison of these data to ecological PRGs should also be included.

I look forward to working with you and the Rhode Island Department of Environmental Management toward the cleanup of the Old Fire Fighter Training Area. Please forward an updated schedule for the soil removal, revetment installation, and subsequent RI/FS work to EPA. Please also explain what effects, if any, the construction of a new bridge and a combat swimming pool will have on the removal actions. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,

Kymberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: Paul Kulpa, RIDEM, Providence, RI
Cornelia Mueller, NETC, Newport, RI
Jennifer Stump, Gannet Fleming, Harrisburg, PA
Steven Parker, Tetra Tech-NUS, Wilmington, MA

ATTACHMENT A

Page	Comment
p. 2-12, §2.6	Dioxins and furans should be identified as potential site related contaminants because of the potential for historical actions such as burning fuel to generate dioxins and furans. Seven surface soil samples were analyzed for dioxin and furans. There were detections in the seven soil samples. In a previous risk assessment, the toxicity equivalent quotients were lower than a level of concern. The method for evaluating dioxin risk has since been updated. The risk assessment that will be conducted to evaluate potential risk to the commercial/industrial receptor should include an evaluation of exposure to dioxins and furans in surface soil. These risk calculations should follow most recent guidance and include the most current toxicity data published by EPA and accepted references for evaluation of exposure to dioxins in environmental media.
p. 4-5, §4.2	The IEUBK model has been updated. The intake value for dietary consumption can now be changed in the latest version of the IEUBK model. The commercial/industrial receptor should be evaluated for exposure to lead in surface soil. This evaluation should use the latest version of the IEUBK model.