

Parker, Stephen

From: Keckler.Kymerlee@epamail.epa.gov
Sent: Thursday, July 23, 2009 3:02 PM
To: winoma.johnson@navy.mil; comelia.mueller@navy.mil; paul.kulpa@dem.ni.gov; Parker, Stephen; Hoskins.Bart@epamail.epa.gov; rtfinglayson@gfnet.com
Cc: olson.bryan@epa.gov; Peterson.David@epamail.epa.gov
Subject: Gould Island

Hi Winoma -

I appreciated the opportunity to talk with you about the **Gould Island Draft QAPP** earlier today. As you know, EPA had three outstanding comments. I spoke briefly with my supervisor and site attorney about these issues and have their support.

1. Coal pile: In an effort to move forward with the field work, EPA agrees with the sampling proposal provided on July 15, 2009 as outlined in Figure 11-1. However, EPA maintains that site is the extent of contamination regardless of CERCLA or property boundaries. Please understand that EPA may require sampling in the future if the data in the vicinity of the former coal pile along the fence line reveal contamination or if there is no clear plan for the Corps to conduct the sampling. EPA encourages the Navy and RIDEM to work with the Corps concomitantly to get the former coal site remediated to ensure that any CERCLA cleanups aren't recontaminated.
2. EPA agrees that the reference data will not be pooled.
3. The rigging platform borings issue has been resolved.

Since all of EPA's comments on the draft QAPP have now been resolved, EPA strongly encourages the Navy to commence completion of the QAPP and conduct the additional field work at Gould Island this summer. EPA recognizes that there may be outstanding RIDEM comments, but believes that we must abide by the procedures set forth in the FFA. Since some of the data collection is time sensitive (i.e., AVS), EPA believes that the Navy should consider mobilizing early to ensure that this field season is not missed. EPA is very concerned that the additional field efforts for this site have already been significantly delayed.

Also, as briefly mentioned in the document that you sent to the team regarding lead regulators references states that the FFAs or "IAGs" will govern how the site should be regulated. As we agreed, this policy does not change anything because the FFA describes our respective responsibilities reasonably clearly.

Please let me know if you'd like to discuss anything further. Thank you.

Kymerlee

Kymerlee Keckler, Chemical Engineer
Federal Facilities Superfund Section
U.S. Environmental Protection Agency, Region 1
1 Congress Street (HBT)
Boston, MA 02114-2023

Telephone: 617.918.1385
Facsimile: 617.918.0385
E-mail: keckler.kymerlee@epa.gov

7/23/2009