



TETRA TECH

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Project Number 112G00949

Mr. Paul Kulpa  
Rhode Island Department of Environmental Management  
Division of Site Remediation  
235 Promenade St.  
Providence RI 02908-5767

Reference: CLEAN Contract No. N62467-04-D-0055  
Contract Task Order No. 458

Subject: Response to RIDEM Letter October 27, 2009  
Draft Final SAP/QAPP, Site 17, Gould Island  
Naval Station Newport, Newport RI

Dear Mr. Kulpa:

On behalf of Ms. Winona Johnson, US Navy NAVFAC, I am providing to you as Attachment A, a response to your letter dated October 27, 2009, in regards to the document referenced above.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

Stephen S. Parker, LSP  
Project Manager

Enclosure

c: D. Barclift, NAVFAC (w/encl.)  
A. Bernhardt, TiNUS (w/encl.)  
W. Johnson, NAVFAC (w/encl.)  
K. Keckler, USEPA (w/encl.)  
P. Golonka, Gannett Fleming (w/encl.)  
C. Mueller, NAVSTA (w/encl.)  
File 112G00949-3.2 (w/encl.)  
AR, c/o Glenn Wagner, TiNUS Pittsburgh (w/encl.)

**ATTACHMENT A**  
**Responses to Comments From RIDEM**  
**Gould Island Draft Final SAP/QAPP for BERA**  
**Comment Letter Dated 10/27/09**

*1) In previous correspondence and meetings this Office has raised questions concerning the validity of the proposed reference station at Potters Cove and requested that it not be employed as part of this study. These concerns focused on the station's location in the bay, as well as the fact that it is located near a number of known source areas. The Navy acknowledged the potential concerns associated with the station, but felt that once the data was collected the location may be found to be acceptable. This course of action was satisfactory to this Office, provided that an assessment would be made to ascertain whether the reference stations were impacted and therefore not suitable for the study. Please confirm that this is still the case.*

Response: The comment reflects the resolution reached during the discussions on the draft QAPP and provided in Navy's response letter of September 30, 2009. Based on this resolution, the last paragraph of Page 51 of the Final QAPP will be revised as follows: "Following collection of sediment samples during the Step 1 sample collection effort, data from the six candidate reference stations (three from Jamestown-Potter Cove, and three from Jamestown-Cranston Cove) will be provided to the project team to discuss which are appropriate to select for detailed ecological sampling during step 2".

*2) Similarly, please confirm that in regards to the evaluation of the toxicity results and tissue analysis with respect to the ability to create dose response curves, the work plan acknowledges that this may not be possible. Furthermore, it appears to state that a professional evaluation of the data may be employed instead.*

Response: Pages 44 and 45 describe the development of dose-response curves. It is stated there that professional judgment may be required to evaluate chemicals if dose response curves do not provide a definitive relationship between concentrations measured (dose) and toxicity measured (response). This statement appears to be clear enough not to need revision.

*3) In regards to sample locations, the Office has recommended that a number of the stations be located closer to the source areas, and/or the result of the initial chemical testing be employed to adjust subsequent sample locations.*

Response: The Navy believes that this issue has been addressed based on previous correspondence, summarized as follows: In RIDEM's letter dated October 17, 2008, RIDEM requested that additional samples be collected closer to the shoreline. After several meetings and discussions to resolve this issue, RIDEM was provided a map at the July 15, 2009 RPM meeting, and was asked to provide input on sample locations, which they did not do. Instead, during the conference call on July 20, 2009, RIDEM asked if the Navy could sample depositional areas at low tide (presumably within the intertidal zone). On August 6, 2009 via email correspondence, the Navy expressed the need for RIDEM to provide the additional sampling locations so that there would be no additional delays in the field effort and again submitted a map to RIDEM. Since no follow-up was provided by RIDEM, on August 18, 2009, via email correspondence, the Navy notified RIDEM that five additional sampling locations close to the shoreline would be selected based on the general location information that was provided previously by RIDEM. Documentation of the additional sampling locations was provided to RIDEM in a Navy letter dated September 3, 2009. On September 10, 2009, a notification of field work was provided via email which indicated a sampling start date of September 21, 2009. On September 18, 2009, via email, RIDEM provided a letter which did not acknowledge the proposed five stations, but instead suggested the Navy withhold from collection of six samples from the outer edge of the northwest shoreline until Step 1 sampling data was available. On September 21, 2009, the Navy responded and stated that the five samples had been added in compliance with the original request.

In summary, the Navy has complied with RIDEM's request to collect additional samples from the shoreline.

*4) Further, we have suggested that in accordance with standard practice two different test species be employed in the toxicity tests. The Office reiterates these recommendations as it will potentially avoid the need to conduct additional studies at the site.*

Response: This issue was addressed in the Navy response letter dated September 3, 2009: Based on previous Navy discussions with EPA and NOAA, the 28 day *Leptochirus* test was selected for evaluating effects of contaminants to the benthic invertebrates from contaminants present and included in the Draft Phase 2 SAP. However, based on discussions between EPA and RIDEM as summarized in an email dated 8/3/09 to the Navy from the U.S. EPA, it was clarified that EPA is not opposed to RIDEM's position to include a second toxicity test. EPA stated their preference to use the *Leptochirus* and *Ampelisca* tests. It was also stated in the same letter, that before the Navy could agree to conduct a second toxicity test, the use of the two sets of data from the two tests would need to be agreed to by the project team, and it would have to be supported by the project DQOs, and stated that additional discussions would be needed before the Navy could agree to include a second toxicity test for this endpoint. Because no resolution was reached between EPA and RIDEM as to the test species to use or how to weight the data, the endpoint was not revised. The QARR will acknowledge that different endpoints were evaluated for use and not selected.

*4) Finally, be advised that, if our understanding with respect to the reference station and the dose response curves for the toxicity tests and tissue analysis are not in concert with the Navy's position, the Office of Waste Management feels these issues are critical enough to potentially force us to seek dispute resolution.*

Response: This point is noted. However, the comments above do not cite disagreement with using professional judgment in the interpretation of dose-response curves. There is no disagreement in the reference station selection process that the Navy is aware of.