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Project Number 1703

Mr. Robert Krivinskas
Remedial Project Manager
Northern Division, Naval Facilities Engineering Command
10 Industrial Highway, Mail Stop 82
Lester, Pennsylvania 19113

Reference: CLEAN Contract No. N62472-90-D-1298
Contract Task Order No. 0173

Subject: Response to comments on the Draft Final SASE Work Plan for
Derecktor Shipyard, Dated September, 1995

Dear Mr. Krivinskas:

On November 3, 1995, I received comments from you on the above referenced document. On November 16, 1995, we received comments on this work plan from the RIDEM. It is my understanding after our conversation on November 30, that we will not be receiving written comments from the USEPA, although they indicated to you that they had unspecified concerns about the Work Plan.

We reviewed the EPA's comments to the Draft Work Plan, and issued amended responses on December 13, 1995. We have prepared responses to the RIDEM comments and are issuing them concurrently with this letter. Northdiv and NETC will receive copies of both these responses. Our responses to the Navy's comments are provided as Attachment A to this letter.

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

Very truly yours,

Stephen S. Parker
Project Manager

SSP/ib

Enclosure

c: B. Wheeler, NETC Newport (w/encl - 1)
J. Trepanowski/M. Turco, B&R Environmental (w/encl - 1)
H. Laguette, B&R Environmental (w/encl - 1)
File 1703-3.2 (w/o encl)
File 1703-2.1 (w/encl - 1)

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**ATTACHMENT A
RESPONSES TO COMMENTS FROM U.S. NAVY NORTHERN DIVISION
ON THE
DRAFT FINAL WORK PLAN FOR ON SHORE SITE ASSESSMENT SCREENING EVALUATION
FORMER DERECKTOR SHIPYARD,
NETC, NEWPORT RHODE ISLAND
(comments dated 17 October, 1995)**

Sec 1.1 pg 1-4: "draft report is scheduled to be published in February, 1995." Incorrect date listed.

Response: The current date for publication of the referenced report is June 2, 1996. This dated will be inserted as appropriate.

Sec 2.2 pg 2-3: Because precipitation can not readily percolate through paved surfaces, water will tend to accumulate on the ground surface, which in this case consists of depressions in the pavement.

Response: B&R Environmental concurs with this statement, and the sentence will be corrected to read as stated above.

Sec 3.3 pg 3-5: Text should be more specific as to how contaminant pathways for the on shore work will be correlated to off-shore contaminants and receptors from both an ecological and human health risk standpoint.

Response: The two paragraphs in Section 3.3, page 3-5, will be replaced with the following text:

"The primary objective of the intrusive investigations is to identify the contaminants present in the fill, the soils, and the groundwater at the site."

"Once the nature of subsurface contamination at the site has been characterized, then additional information will be used to identify possible mechanisms of contaminant transport and potential exposure pathways to human receptors and the marine environment near the shipyard. Such additional information is likely to include the following: published information on the environmental fate and transport of the contaminants detected; published exposure data on human and animal receptors; and characterization of the site (physical environment, areas of potential contaminant exposure, plausible contaminant migration routes, and potentially impacted human and/or ecological receptors). In addition, comparisons between the on-shore and off-shore analytical databases will be conducted to identify contaminants common to both databases and, thus, those most likely to be associated with direct migration routes from the site into the marine environment."

"Therefore, the information generated by the intrusive investigations and associated tasks will constitute a basis for the preparation of a preliminary human health risk assessment for the site, and will provide support to the investigations and ecological risk assessment for the off-shore environment."

Sec 3.3.1.1 pg 3-7: Text should detail what will occur if signs of stressed vegetation are present.

Response: The last paragraph of page 3-7 will be modified as follows:

"Six test pits will be excavated in the South Waterfront Area. Prior to excavation, the area will be inspected to attempt to identify areas of stressed vegetation. If areas of stressed vegetation are identified, test pits will be stationed at these areas. If no stressed vegetation is identified during the initial inspection, the six test pits will be spaced at even intervals along the waterfront and alternate between the western and eastern sides of the soil piles. Care will be taken to avoid damage to the intertidal area near these locations.

Sec 5.1 pg 5-2: Text should be more specific concerning how background determinations for surface soils will be derived. eg: sources of data, method of calculation.

Response: Section 5.1 will be amended as follows to describe the use of upgradient samples and determination of background conditions:

"Background concentrations will be determined by sample collection and analysis. Background samples of surface soils will be collected from the boring locations as described in Section 3.3.2.1 of the work plan. Arithmetic averages of contaminant concentrations in these samples will be calculated and used as references for comparison of contaminant concentrations in site samples."

Section 3.3.2.3 describes the approach for collection of samples from borings, including the surface interval. The first paragraph of this section may be altered to accommodate a compromise between the EPA, who requested a 0-1 foot surface sample and DEM, who requested a 0-2 foot surface sample.

Sec 5.2 pg 5-3: Text should be changed to read: "The preliminary risk assessment will be prepared *in accordance* with current USEPA guidance."

Response: B&R Environmental concurs with this statement, and the sentence will be corrected to read as stated above.

Sec 5.3 pg 5-3: According to the work plan, the report produced from this document will "determine additional data requirements and the appropriate approach for conducting a terrestrial ecological risk assessment." The Navy should be provided with access to the data results and conclusions of the screening assessment prior to making the determination of appropriate additional work in order that we may participate in and be prepared for the scoping of a further study. This briefing could be accomplished in the form of a meeting that would occur prior to the submittal of the draft. This is consistent with the approach that was discussed in the recent NETC Newport Team partnering session.

Response: B&R Environmental concurs with this approach. The intention of the referenced statement is to provide regulators with the understanding of how the data will be used. Navy input into the report prior to the release to the regulators is essential. These logistics will be worked out when the work plan is approved and the project is scoped in detail.

Sec 5.3 pg 5-5:

Change text to read: "the on shore ecological conceptual model will be prepared *in accordance* with the framework for problem formulation...". Also please include a listing, similar to the one provided for the human health risk section, that details examples of guidance documents that will be followed when preparing the ecological assessment. Include Wentzel, R., et al *procedural Guidelines for Ecological Risk Assessments at U.S. Army Sites*. Edgewood Research, Development, and Engineering Center. U.S. Army Chemical and Biological Defense command. Aberdeen Proving Ground, MD. as a reference.

Response:

The last paragraph of the text in Section 5.3, page 5-5, will be replaced with the following text:

"The on-shore ecological conceptual model will be prepared in accordance with the framework for problem formulation of ecological risk assessments, as described in U.S. EPA guidance documents (U.S. EPA 1991; 1992a; 1992b) and in Wentzel et al. (1994). Other supporting references may include Bartell et al. (1992), Maughan (1993), Suter et al. (1993), and U.S. EPA (1989a; 1989b; 1989c). In addition, U.S. EPA's "Ecological Risk Assessment Guidance for Superfund: Process for Designing and Conducting Ecological Risk Assessments" will be consulted if the final version of this document has been released."

"Under agreement with the regulators, the future use of the Derecktor Shipyard property (if determined during the performance of the study) may also be taken into consideration during the preparation of the conceptual model."

In addition, the following references will be included in the REFERENCES section of the work plan:

Bartell, S.M., R.H. Gardner, and R.V. O'Neill. 1992. Ecological Risk Estimation. Lewis Publishers. Lewis Publishers, Chelsea, Michigan.

Maughan, J.T. 1993. Ecological Assessment of Hazardous Waste Sites. Van Nostrand Reinhold. New York, New York.

Suter, G.W., L.W. Barnhouse, S.M. Bartell, T. Mill, D. Mackay, and S. Paterson. 1993. Ecological Risk Assessment. Lewis Publishers, Chelsea, Michigan.

U.S. EPA. 1989a. Risk Assessment Guidance for Superfund, Volume II: Environmental Evaluation Manual. U.S. Environmental Protection Agency, EPA 540/1-89/001. Dated March.

U.S. EPA. 1989b. Ecological Assessment of Hazardous Waste Sites: A Field and Laboratory Reference. U.S. Environmental Protection Agency. EPA 600/3-89/013. Dated March.

U.S. EPA. 1989c. Supplemental Risk Assessment Guidance for the Superfund Program; Part 2 - Guidance for Ecological Risk Assessments. Risk Assessment Work Group, U.S. Environmental Protection Agency - Region 1. EPA 901/5-89-001, Draft Final. Dated June.

U.S. EPA. 1991. Ecological Assessment of Superfund Sites: An Overview. ECO Update, Vol. 1, Num. 2. U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response. Publication 9345.0-05I. Dated December.

U.S. EPA. 1992a. Framework for Ecological Risk Assessment. Risk Assessment Forum, U.S. Environmental Protection Agency. EPA/630/R-92/001. Dated February.

U.S. EPA. 1992b. Developing a Work Scope for Ecological Assessments. ECO Update, Vol. 1, Num. 4. U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response. Publication 9345.0-051. Dated May.

Wentsel, R.S., T.W. LaPoint, M. Simini, R.T. Checkai, D. Ludwig, and L. Brewer. 1994. Procedural Guidelines for Ecological Risk Assessments at U.S. Army Sites, Volume I. Edgewood Research, Development & Engineering Center; U.S. Army Chemical and Biological Defense Command; Aberdeen Proving Ground, MD. ERDEC-TR-221. Dated December.