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C-NAVY-3-99-1338W

March 29, 1999

Project Number N7752

Mr. James Shafer
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. 0302

Subject: Responses to Comments, Final PRG Technical Memorandum,
Former Derecktor Shipyard
Naval Station Newport, Newport Rhode Island

Dear Mr. Shafer:

Attached are responses to comments to the Final PRG document for the Derecktor Shipyard at Naval Station Newport in Newport Rhode Island. It is our understanding that these issues are the only ones requiring resolution prior to moving forward with the FS at this site. Therefore, these comments and responses should be used to direct discussions at the next EAB meeting scheduled to be held April 21 at 10:00 AM.

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

Very truly yours,

Stephen S. Parker
Project Manager

SSP/rt

attachment

c: M. Griffin, NETC (w/encl. - 4)
K. Keckler, USEPA (w/encl. - 3)
P. Kulpa, RIDEM (w/encl. - 4)
J. Stump, Gannett Fleming (w/encl. - 2)
K. Finkelstein, NOAA (w/encl. - 1)
D. Egan, TAG (w/encl. - 1)
J. Trepanowski/G. Glenn, TTNUS (w/encl. - 1)
File N7752-3.2 (w/o encl.)

Attachm nt
Responses to RIDEM Comments on the
Final Preliminary Remediation Goals (PRGS)
for Derecktor Shipyard/Coddington Cove
Comments Received December 21, 1998

2. **Section 2.1, PRG Development Approach;**
Page 4, Paragraph 2.

The Navy has indicated that benthic organisms, including worms and shellfish which directly digest sediments, due to their morphology, obtain all contaminants from pore water and not from the sediments which are digested. Please provide a copy of the reference material to support this position.

Response: The requested document will be provided to the RIDEM by the USEPA as indicated by Cornell Rosiu at the EAB meeting held March 18, 1999. The agreement at that time was to provide the document to the RIDEM so that they could review it and provide an opinion on whether they adopt the approach described which is based largely on equilibrium partitioning. It should be noted that this equilibrium partitioning approach applies to this and other issues stated later in this response summary.

3. **Section 2.1, PRG Development Approach;**
Page 4, Paragraph 2.

The Navy has stated that the concentrations of contaminants released by sediment falling through a water column and then diluted by a factor of four is greater than that caused by sediment which have had time to come into equilibrium with the surrounding pore water. Please provide the reference material to support this position.

Response: The reviewers should be aware that elutriate is a 1:4 dilution of sediment to water. There is no documentable reference material that would clearly support the observation that elutriate has a larger toxic effect biota than the pore water at this site. This issue should be discussed as it is pertinent to several outstanding issues for the Derecktor Site.

5. **Section 2.1, PRG Development Approach;**
Page 4, Paragraph 2.

The Navy has employed an AVS equal to zero to address bedded sediments. It is assumed that bedded sediments refer to sediment collected from core stations. Please confirm and include a definition of bedded sediments in this section of the report. In addition, for clarity, in this section, the report should state whether bedded sediments were used in the selection of polygons for remediation.

Response: The bedded sediments used for development of the PRGs include surface sediments that are in place, as opposed to being in suspension. PRGs were specifically developed for bedded sediment as shown in the Draft Final FS and Final PRG document. Since the reviewer is not clear on the use of AVS and the approach for use of bedded sediment versus sediment that is in suspension, this should be discussed further.

6. **Section 2,1, PRG Development Approach:**
Page 4.

The Navy has performed an evaluation to determine whether elimination of the biotoxicity screen will increase the number of COCs or change the PRG value. In this evaluation it appears that the conservative assumption of resuspension with AVS=0 is assumed for divalent metals. Please confirm, and modify the report accordingly. For all other metals, although not stated, it is assumed that the elimination of this criteria will not increase the number of COCs. Please confirm and modify the report accordingly. In regards to SVOCs, the Navy noted that employing the biotoxicity criteria will result in several individual PAHs being eliminated from consideration. However, these compounds would be addressed via Total PAH. Please indicate whether use of the individual PAHs will increase the number of polygons requiring remediation, or result in a lower PRG value than that dictated by Total PAHs.

Response: Some of the issues in the comment above have been addressed in the final PRG Tech Memo Pages (8-10). The others should be discussed in detail, as the actual questions related to AVS and biotoxicity seem to recur in other comments and discussions held.

8. **Section 2,2, Aquatic TEV Derivation:**
Page 7

There are two issues regarding the applicability of the State WQC. The one addressed by this comment is simply the use of States WQC values in lieu of EPA WQC as performed in the document. The second involves the applicability of WQC to pore water, an issue the State agrees has not been resolved.

As the first issue simply involves the replacement of the more conservative State WQC with the EPA WQC value, which is in concert with the Superfund process, it can be implemented at this time.

Response: This issue has been addressed at the EAB meeting held March 18, 1999, and in a follow-up correspondence from the Navy.

9. **Section 2.4.1, Benchmark Selection HQ Derivation;**
Page 13, Whole Section.

Comment:

The State realizes that the authors of the PRG document are not responsible for the Human Health Risk Assessment report for Derecktor Shipyard. This comment was designed to advise the authors of potential changes in this document. Therefore, please be advised that the Human Health Risk Assessment has not been finalized. As stated in previous correspondence, the State requests that the regulatory agencies meet to resolve this issue as it affects this and other documents related to the site.

Response: This issue was addressed at the EAB Meeting 14, held March 18, 1999, and in a follow-up correspondence from the Navy.

11. Section 3.2, Appr ach for Spatial Implementation of PRGs; Page 21, Whole Section.

The Navy has indicated that predesign studies are designed to further delineate the areas of concern. The Office agrees. The Office simply requested that the Navy employ the ACOE results in the application of the PRGs. The final delineation of the areas of concern will be performed during design work. Therefore, please apply the ACOE results to the present study.

Response: The Navy proposes to not use the ACOE results for the delineation of the polygons because doing so would not change the selected remedial action. The ACOE data only includes three metals, and of these, only lead has a Recommended PRG and could be used to refine polygons. RIDEM also requested use of this data for the ERA and it was pointed out that the ACOE data was too limited (only three metals analyzed) and the quality control protocols used for collection and analysis were unknown.

In addition, the areas selected for remedial action in the FS are only representations of the outcome of the action. These representations are developed for the purpose of comparing the cost of each alternative using consistent parameters. Use of the data would refine polygons 20, 11, 5, and 32. The area calculated into the cost estimate would most likely be increased, thus increasing the cost estimates accordingly.

The Navy proposes that instead of revising existing documents with incomplete and unconfirmed data, these areas be included in the predesign investigations discussed in the comment.

12. Section 3.3, Assessment of PRGs for Risk Assessment Reduction; Page 22, Whole Section.

The PRG document function is to propose remediation numbers for areas that have been identified as areas of concern in the ecological and human health risk assessment, not vice a versa. The areas in question have been identified as areas in the various risk assessments and the PRG document should address these areas. Therefore, the Office re-iterates its comment.

(Comment was that PRGs did not address intermediate risk areas.)

Response: This issue was discussed at length at the EAB meeting held March 18, 1999. It was resolved that the approach (that Recommended PRGs address the high risk areas and the intermediate risk areas where action is supported by the results of the risk assessment) was effective in deriving an appropriate remedial action for McAllister Point Landfill nearshore and offshore areas.

If the RIDEM is not satisfied that this rationale is also appropriate for Derecktor offshore areas, additional discussions should be held in an attempt to reach a resolution.

13. S ction 3.3, Assessment of PRGs for Risk Assessment Reduction; Page 23, HMW PAHs.

The Navy has indicated that one high risk station DSY-9 had a HQ of 4.3, while a second high risk station DSY-27 had a HQ of 1.47 and a low risk station DSY-30 had a HQ of 1.49. This discrepancy between the latter two stations are used in support of the recommended HQ greater than two (the rest of the Navy's response deals with stations located in proximity to each other). This same discrepancy may also be used in favor of the argument for use of a HQ value less than two. Please indicate whether there are any other factors which may be contributing to this discrepancy, such as whether risk drivers other than PAHs are responsible for the risk at Station 27.

Response Ecological risk at station 27 is driven by PCBs, as described on Page 24 of the final PRG document.

15. Section 3.3, Assessment of PRGs for Risk Assessment Reduction; Page 24, Lead.

The Office has reviewed the Navy response and requires further clarification. Due to the complexities associated with this comment the Office recommends that this issue be discussed verbally.

Response: The Navy concurs. The original comment focused on the justification of developing a PRG based on a HQ of 2 or more. The Navy requests that the concerns of RIDEM be reconsidered in light of the findings of the Final PRG document, and the agreements made for McAllister Point at EAB Meeting 14.

16. Section 3.3, Assessment of PRGs for Risk Assessment Reduction; Page 24, Total PCBs.

The Navy has indicated that the biotoxicity assessment attributes the high risk at station 29 to lead and not to PCBs. Please elaborate.

Response: The issue of the use of biotoxicity tests was addressed for McAllister at the EAB meeting held March 18, 1999. As for the previous comment, the Navy proposes to address this issue at the next EAB meeting.

17. Section 3.3, Assessment of PRGs for Risk Assessment Reduction; Page 24, Total PCBs.

The Navy has indicated that the Long and Morgan values for PCBs are artificially increased due to the presence of other contaminants in the field... ...Please indicate whether there has been any studies that address this issue.

Response: The original comment stated by RIDEM focused on requesting an explanation why the proposed PRG for PCBs is higher than the ERM value. This issue was addressed at length at the EAB meeting held on March 18, 1999. The reviewer is requested to refer to the minutes of that meeting, and if the RIDEM has any further questions on this issue, they should be addressed at a future meeting.

18. **Section 3.3, Resuspension Evaluation;**
Page 25, Whole Section.

The Navy's modeling exercise was designed to delineate the areas which are subject to resuspension, not areas in which resuspension may or may not result in an exceedence of PRGs. Therefore, as the function of the model was to delineate areas of resuspension, and as these areas were observed in a real life situation, the State reiterates its comment. (Comment was that the resuspension model was incorrect and predicted no resuspension while docking the Saratoga)

Response: The resuspension issue was discussed briefly at the EAB meeting 14, held March 18, 1999. It was agreed that the resuspension issues be tabled until a future meeting. The Navy proposes to discuss this issue at that meeting, planned to be held in April.