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NCBC DAVISVILLE
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LETTER AND COMMENTS FROM U S EPA REGION I REGARDING DRAFT FINAL WORK
PLANS FOR SITE INSPECTION AT CAMP FOGARTY NCBC DAVISVILLE RI
11/29/2010
U S EPA REGION I



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NEW ENGLAND - REGION I
5 POST OFFICE SQUARE, SUITE 100
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BOSTON, MASSACHUSETTS 02109-3912

November 29, 2010

Jeff Dale

Dept of the Navy, BRAC PMO Northeast
Code 5090 BPMO NE/JD, 4911 South Broad St
Philadelphia, PA 19112-1303

Re: *Draft Final Work Plans, MMRP, Site Inspection, at Camp Fogarty, at the Former Davisville Naval Construction Battalion Center (NCBC), Rhode Island*

Dear Mr. Dale:

Pursuant to § 7.6 of the Davisville Naval Construction Battalion Center Federal Facility Agreement dated March 23, 1992, as amended (FFA), the Environmental Protection Agency has reviewed the subject document and comments are below.

General Comments

1. Please include analysis for VOC, SVOC, Pesticides & PCB for the sample to be collected under the metal debris pile. Army has not provided documentation of what was in the rusted drums found in the pile and therefore a greater suite of analysis should be performed.
2. EPA agrees with the majority of the comments from RIDEM. However, we do not have the same issues with compositing that RIDEM has, please see the general comment on the QAPP below. MA has a standard of 2 ppb for perchlorate and EPA has issued an interim hazard advisory level of 15 ppb perchlorate in drinking water. EPA has used 1 ppb as a screening level at other sites. The Screening level should be low enough to meet the interim hazard advisory level of 15 ppb. EPA does not have an MCL for lead, it is a tap water action level of 15ppb. While RIDEM is concerned with an additional SI for this site, EPA would be satisfied with a full suite of analysis for the sample collected under the metal debris pile and subsurface sampling at the proposed surface sample location across the site. EPA has the missing appendices on CD.

Specific Comments

3. Worksheet # 11, please add the analytical method to the sampling and extraction method (5035) for VOCs in soil.
4. Work sheet #15, please change the units from soil to water on page 15-17

QAPP (Appendix E) Draft Site Investigation Work Plan Camp Fogarty Training Site dated October 14, 2010

General Comments

5. This QAPP refers to Multi-Incremental Sample (MIS), but the description and SOP included implies simple composite sampling. MIS has been utilized at several munitions sites including Region 1. Typically this would mean following a procedure similar to that written by CRREL (U.S. Army Cold Regions Research and Engineering Lab in Hanover, NH), and includes several steps in collecting and processing the samples such as putting them through a sieve, and grinding the samples up into a homogenous powder. Additional information can be provided by EPA.

Page-Specific Comments

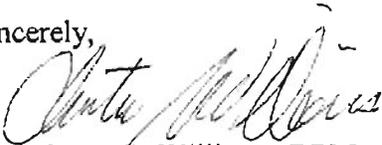
6. Worksheet #11, Page 11-5, second paragraph The text in this section does not include any comparability criteria for the XRF screening samples, and the samples analyzed in the fixed lab. Acceptance criteria need to be established in order to determine if the number of fixed lab samples is sufficient. SW 846 Method 6200 has some information related to this in Section 9.7.
7. Worksheet #11, Page 11-10, Figure 11-4 It would be helpful if the groundwater flow direction was added to this figure.
8. Worksheet #11, Page 29 of 30, Table 11-4, TAL Metals The quantitation limits for antimony and arsenic are above the screening levels. There are methods available that can meet these screening levels. Please clarify why another analytical method is not used for antimony and arsenic.
9. Worksheet #14, Page 14-5, Data Review Tasks: Please reference and use for this project the EPA Region 1 Data Validation Guidelines, not the National Functional Guidelines.
10. Worksheet #19, Page 19-1 The maximum holding times for explosives is 14 days

prior to extraction, and 40 days after extraction (also see Section 10 of the analytical SOP). Perchlorate is not preserved with HNO₃, and has a holding time of 28 days (also see Section 10 of the analytical SOP). Please revise accordingly.

11. Worksheet #28, Field Duplicate There is acceptance criteria when the results are >5X the RL, but how are field duplicates evaluated when the results are <5X the RL?
12. Worksheet #30, Page 30-1 ESS is listed as the lab for all analytical groups, but the SOPs included for explosives and perchlorate are from GEL in Charleston, SC. Please clarify and/or revise accordingly.
13. Worksheet #30, Page 30-2, Perchlorate The analytical method for perchlorate should be EPA Method 314, not 341. Please revise accordingly.

If you have any questions with regard to this letter, please contact me at (617) 918-1384.

Sincerely,



Christine A.P. Williams, RPM
Federal Facilities Superfund Section

cc: Richard Gottlieb, RIDEM
Johnathan Reiner, ToNK (via e-mail only)
Steven King, RIEDC (via e-mail only)
Dave Barney, BRAC PMO (via e-mail only)
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