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LETTER REGARDING RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL
MANAGEMENT COMMENTS ON 12 JANUARY 2011 CONFERENCE CALL NOTES FOR
SITES 1 THROUGH 4 NCBC DAVISVILLE RI
03/01/2011
RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

1 March 2011

Mr. Jeffrey Dale, RPM
US Department of the Navy
BRAC PMO, Northeast
4911 South Broad Street
Building 679, PNBC
Philadelphia, PA 19112

RE: 12 January 2011 Conference Call Notes
Sites 1 thru 4 (Construction Equipment Division Sites)
Naval Construction Battalion Center
Davisville, Rhode Island
Submitted 25 February 2011, Dated 25 February 2011

Dear Mr. Dale:

The Rhode Island Department of Environmental Management, Office of Waste Management (RIDEM) has reviewed the above referenced document. Comments are provided below:

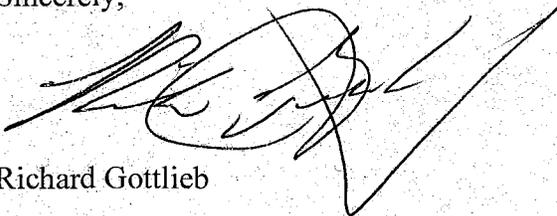
1. Page 1, Surface Soil – This section defines surface soil as existing from 0 to 2 feet below ground surface and subsurface soil from 2 to 10 feet below ground surface. Please be advised that Section 8.02(A)(i)(2) of the RIDEM Remediation Regulations defines soils for residential scenarios as encompassing the entire vadose zone (i.e.; from the surface to the top of the water table irrespective of depth). For commercial/industrial scenarios surface soil is applied to a depth of at least 2 feet below the ground surface. It is not clear why it is unlikely that anyone would come in contact with soil below 10 feet of depth. The excavation for building foundations and the laying of sewer lines, both probable activities in this area, can easily require digging at depths greater than 10 feet. Please revise accordingly.
2. Page 2, COPCs – For surface soil the selected COPCs are PAH, PCBs, Al, Sb, As, Be, Co, Fe, Pb, Mn and Hg. For subsurface soils the selected COPCs are the metals Al, Sb, As, Be, Cd, Co, Fe and Mn. Please be advised that for evaluation of the residential scenario Cd must also be included in the analysis for surface

soils if it exists within the vadose zone. In addition, please explain why Fe is considered a COPC since it is an essential nutrient.

3. For the slide on Human Health Exposure Factors – Assumptions for the Construction Worker an exposure frequency of 150 days/year is proposed over a one year duration. This seems low. If one assumes 250 work days/year (52 weeks at 5 days/week) – 10 vacation days – 10 sick days – 10 holidays the exposure frequency should be 220 days/year.
4. For the slide on Human Health Exposure Factors – Assumptions for the Recreational User show an ingestion rate of 100 mg/day for adults and 200 mg/day for children and then this is multiplied by a fraction ingested rate of 0.5. Please explain where the ingestion rate came from and why it is being multiplied by 0.5.
5. Please provide the human health exposure factors for the lifetime residential user.

RIDEM would like to thank you for the opportunity to comment on this document and looks forward to working with the Navy and USEPA. If you have any questions or require additional information please call me at (401) 222-2797 ext. 7138 or e-mail me at richard.gottlieb@dem.ri.gov.

Sincerely,



Richard Gottlieb

Cc: M. Destefano, DEM OWM
C. Williams, EPA Region 1
D. Barney, BRAC Environmental Coordinator
S. Vetere, TTNUSNCBC Site 01-04 011111