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LETTER FROM U S NAVY REGARDING REQUEST FOR EXTENTION TO CURRENT  
SCHEDULE FOR SUBMISSION OF DRAFT FINAL PROPOSED PLAN AND DRAFT FINAL  
RECORD OF DECISION SITE 16 NCBC DAVISVILLE RI

8/10/2012

BASE REALIGNMENT AND CLOSURE PROGRAM MANAGEMENT OFFICE, NORTHEAST



**DEPARTMENT OF THE NAVY**  
BASE REALIGNMENT AND CLOSURE  
PROGRAM MANAGEMENT OFFICE, NORTHEAST  
4911 SOUTH BROAD STREET  
PHILADELPHIA, PA 19112-1303

5090  
BPMO NE/DB  
Ser 12-107  
August 10, 2012

Ms. Christine Williams  
Mail Code: OSRR07-03  
U.S. Environmental Protection Agency, Region I  
5 Post Office Square, Suite 100  
Boston, MA 02109-3912

Mr. Richard Gottlieb  
Office of Waste Management  
Rhode Island Department of Environmental Management  
235 Promenade Street  
Providence, RI 02908-5767

Dear Ms. Williams and Mr. Gottlieb:

This letter is to request an extension to the current schedule for the submission of the Draft Final Proposed Plan (PP) and subsequent draft Record of Decision (ROD) for Site 16, Naval Construction Battalion Center, **Davisville**, Rhode Island. The reason for this extension is to obtain your concurrence on the concepts of a modified PP that addresses the concerns expressed by you with regards to source treatment of groundwater and to balance these actions with the needs of the Local Redevelopment Authority (LRA) with regards to productive use of the property while retaining a component of monitored natural attenuation.

The modified PP concepts as summarized below also address your concerns for plume discharge to Allen Harbor and shortened time to reach remedial goals. In addition, you had also offered to modify remedial goals for groundwater as well as a modified approach to address soil concerns in the North Central Area (NCA) that was endorsed by the LRA and is outlined below.

Groundwater:

- Install reactive or bio-barrier along the southern edge of Allen Harbor;
- Limited and short duration in-situ treatment (chemical oxidation) in existing pilot study injection wells;
- Natural attenuation of eastern arm of plume and the building 41 still area;

- Adjustment of remedial goals to Rhode Island GB criteria;
- Land Use Controls (LUCs) to restrict use of groundwater, and for building construction to mitigate the potential for vapor intrusion;
- Streamlined Long Term Monitoring; and
- 5 Year Reviews.

Soils:

- Excavation of necessary surface soil down two feet and backfill to meet RIDEM Direct Contact criteria for Commercial/Industrial soils in the NCA;
- Excavation as necessary of the unsaturated zone soil in the immediate vicinity of Building E-107 down to the top of the water table and backfill to meet RIDEM Direct Contact criteria for Residential soils.
- Land Use Controls for soils greater than two feet below grade across the entire NCA;
- Classification of NCA as waste management unit to alleviate ground water standards beneath NCA; and
- Soil management Plan for soils beneath two feet from grade across the whole NCA; and
- 5 year Reviews.

The foregoing is provided with the acknowledgement that the remedial timeframe may still be long for deep groundwater south of Davisville Road as there is no foreseeable use of groundwater at this time. However, we do expect a reduced time frame to reach remedial goals than was previously predicted.

Within 45 days upon our mutual concurrence with the above conceptual plan the Navy will submit a draft final PP so that we may continue towards public review and ultimate implementation of this remedy in a timely fashion. Navy responses to your comments on the draft PP will be submitted on August 17<sup>th</sup> in accordance with the current schedule.

If you have any questions in the interim, please do not hesitate to contact me at 617-753-4656.

Sincerely,



DAVID BARNEY  
BRAC Environmental Coordinator  
By direction of BRAC PMO

Copy to:

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