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LETTER AND RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
COMMENTS TO THIRD FIVE-YEAR REVIEW NCBC DAVISVILLE RI (PUBLIC DOCUMENT)
2/19/2013
RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

19 February 2013

Mr. Jeffrey Dale, RPM
BRAC PMO Northeast
4911 South Broad Street
Bldg. 679, PNBC
Philadelphia, PA 19112

RE: Third Five-Year Review Report
Naval Construction Battalion Center
Davisville, Rhode Island
Submitted 31 December 2012, Dated 28 December 2012

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 iii, Five-Year Review Summary Form, Last Line – Please change due date from 03/28/2012 to 03/28/2013. This would then be five years from the triggering action of March 28, 2008.
2. Page v, Five-Year Review Summary Form, Allen Harbor Landfill, Item 3 – This item states that a technical memorandum will be prepared for data collected in the offshore area during October 2012. It is assumed that this is in reference to the shellfish data. If this is the case then perhaps this item should be revised to state that the technical memorandum will be prepared after the fourth round of data is collected.
3. Page 2-6, Section 2.2.2, Land and Resource Use, Paragraph 4, Sentence 3 – This sentence notes that Allen Harbor was closed to shellfishing primarily due to discharge from a sewage treatment plant. The sewage treatment plant never discharged to Allen Harbor. Please revise this to state that the main reason Allen Harbor was closed to shellfishing was due to surface runoff from Allen Harbor Landfill, though there were other sources of contamination.
4. Figure 2-19, Cross Section Line #1 – Please change the color scheme to match the other four companion Figures. For example silt in X-Section Line #1 is a tan color

while in the other four X-Sections it is a brown color. This can be confusing since from Well MW07-14 to MW07-05 all five Figures (2-19 thru 2-23) are the same.

5. Page 2-47, Section 2.5.2.6, Sediment and Surface Water Sampling Data, Paragraph 1, Sentence 2 – This sentence states that there are no PALs for sediment because the RI did not identify unacceptable risk associated with exposure to sediment. PALs should be developed for sediment as concentrations could increase to unacceptable levels as the plume migrates to the shores of the site. The sediment PALs could be added in at the same time the ESD is being prepared for the source removal action.
6. Page 2-53, Section 2.6.2, Changes in Standards and TBCs, Last Paragraph, Last Sentence – This sentences notes that federal AWQS were last updated in 2009 and Rhode Island WQS were last updated in 2006. A comparison of these changes are reflected in Table 2-4. Upon inspection of Table 2-4 there is no reference to the Rhode Island WQS. Please include this in Table 2-4.
7. Page 3-14, Section 3.3.2.3, Long-Term Monitoring, Bullets – Please add a bullet for the collection of 4 rounds of shellfish sampling in front of the created wetlands as previously agreed to.
8. Page 3-15, Section 3.3.2.3, Long-Term Monitoring, Paragraph 2, Sentence 2 – Please note that there will be four rounds of sampling shellfish in front of the created wetlands. Sentence 3 seems to indicate that the October 2012 sampling event is the only event for sampling shellfish in front of the created wetland.
9. Page 3-28, Section 3.5.2.2, Item 3 – This section notes that the PAL for nickel in piezometers has been exceeded on numerous occasions, but that groundwater samples have not exceeded the nickel PAL. Based on this the Navy draws the conclusion that nickel PAL exceedances are not due to migration from the landfill. The piezometers are located in the created wetlands. The substrate for the wetlands was the dredge material from the entrance channel to Allen Harbor. Five samples were collected from the dredge material on 25 July 1996. With respect to nickel, the five samples ranged from 4.0 to 11.4 ppm. While this appears to be a very low concentration when compared to RIDEM residential direct exposure criteria of 1,000 ppm perhaps the Navy should determine if nickel is leaching from the created wetlands as this would appear to be the only other potential source of nickel. It should also be noted that there have only been two exceedances of the 51.6 mg/kg PAL for nickel in sediment (ME08, SED09-07 @ 94J and ME23, SED09-12 @ 78.8J).
10. Page 3-37, Section 3.5.3.2, Tetra Tech Site Inspections, Bullets – A bullet should be added for inspection of the drainage channel in the northern portion of the site.

11. Page R-6 – The August 2004 RIDEM Remediation Regulations are referenced. In the future please reference the November 2011 version of the RIDEM Remediation Regulations.
12. Appendix A – There is no record of an interview with Jonathan Reiner of North Kingstown and Philip Bergeron is listed on the interview for Elyse LaForest. In addition, please explain why the Long-Term Monitoring Questionnaire format is not followed in the Interview Record.

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 email me at richard.gottlieb@dem.ri.gov.

Sincerely,



Richard Gottlieb

Cc: M. Destefano, DEM OWM
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