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LETTER REGARDING RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL  
MANAGEMENT COMMENTS ON THE FEASIBILITY STUDY AMENDMENT FOR SITE 16  
NCBC DAVISVILLE RI  
9/26/2013  
RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT



RHODE ISLAND

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

26 September 2013

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

RE: NCBC Site 16  
Feasibility Study Amendment  
Davisville, Rhode Island  
Submitted 19 September 2013, Dated 18 September 2013

Dear Mr. Dale:

The Rhode Island Department of Environmental Management, Office of Waste Management (RIDEM) has reviewed the above referenced document and has the following comments: Please note that RIDEM only requests a written response to these comments as the concerns can be addressed during the remedial design phase, i.e. RIDEM is not requesting a revision this FSA.

1. Page 3-8, Soil Alternative G-3B, Section 3.2.1, Component 2: Monitored natural Attenuation and Monitoring, Paragraph 2 – This paragraph states that COCs naphthalene and arsenic would not be monitored due to low frequencies of detection and low concentrations. It is not clear that arsenic would naturally attenuate. There are many factors that can affect this such as soil types, other metals in the groundwater, pH, redox potential, etc. because of the low concentration and frequency of detection RIDEM would recommend that arsenic be sampled at least once every 2 years and naphthalene at least once every four years.
2. Page 3-9, Groundwater Alternative G-3B, Section 3.2.1, Component 3: LUCs, Paragraph 2 – Once Navy is notified of a well installation RIDEM would also like to be notified. Ideally, both Navy and RIDEM should be notified prior to the well installation.
3. Page 3-10, Groundwater Alternative G-3B – Please change “Component 6: Five-Year Reviews” to “Component 4: Five-year reviews”.

4. Page 3-12, Soil Alternative G-3B, Section 3.2.2, Detailed Analysis, Overall Protection of Human health and the Environment, Paragraph 2 – Similar to comment 1 please state what studies the Navy has done to show that arsenic would naturally attenuate.
5. Appendix A - Process Calculation and Vendor Information – Table entitled “Mass of Contaminates Greater than Industrial Criteria in Soil Removed in S-3A” – Why is lead, arsenic and TPH expressed in mg/kg and BaP Eqs, Naphthalene and Benzene expressed in ug/kg? Areas 1E, 2E, 3E and 4E are associated with the marina therefore recreational standards should apply not industrial. For arsenic the remediation goal is stated as 13 mg/kg. RIDEM has a standard of 7 mg/kg for both RDEC and I/C DEC.

Assuming that the ug/kg is supposed to be mg/kg the goal for BaP Eqs is listed as 800, based on Navy correspondence is not the standard 400 mg/kg? For naphthalene the goal is stated as 500, RIDEM recreational standard is 54 mg/kg which would apply to area 1E, 2E, 3E and 4E.

6. Appendix E – Ecological Trigger Concentration Calculations, Table 1 – The human health screening level for surface water lists benzene at 38.5 ug/l. RIDEM’s GB Groundwater Objective for benzene is 140 ug/l and the GA Groundwater Objective is 5 ug/l. Benzene exceeds the GA Groundwater Objective. This is noted because USEPA is applying MCLs to the site.

For tetrachloroethene the human health screening value is 1,140 ug/l. RIDEM GA and GB groundwater Objectives are 5 ug/l and 150 ug/l, respectively. Both the GA and GB Groundwater Objectives are exceeded.

For both benzene and tetrachloroethene the screening value should be changed to the more stringent standard.

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](mailto:richard.gottlieb@dem.ri.gov).

Sincerely,



Richard Gottlieb, P.E.

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