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LETTER REGARDING RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL
MANAGEMENT COMMENTS ON THE DRAFT RECORD OF DECISION FOR SITE 16
CREOSOTE DIP TANK AREA, FIRE FIGHTER TRAINING AREA AND FORMER BUILDING 41
NCBC DAVISVILLE RI
2/19/2014
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 2014

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 – Creosote Dip Tank Area, Fire Fighter Training Area, and
Former Building 41 – Draft Record of Decision
Naval Construction Battalion Center
Davisville, Rhode Island
Submitted 27 January 2014, Dated 23 January 2014

Dear Mr. Dale:

The Rhode Island Department of Environmental Management, Office of Waste Management (RIDEM) has reviewed the above referenced document and comments are presented below:

1. **Page 2** – The Figure on this page, which delineates the location of NCBC in relation to Rhode Island should be labeled as Figure 1-1. The current Figure 1, Site 16 Location Map should be labeled as Figure 1-2.
2. **Page 4, Section 1.4, Description of Selected Remedy, Last Arrow** – This arrow states that disturbance of soil covers is prohibited. As written this would preclude the development of the site as it would limit where development could be sited. Perhaps this could just state that there would be soil covers and at the end of this arrow note that a soil management plan will be implemented to address any disturbance to the soils and covers.
3. **Page 7, Section 2.1 Site Name, Location, and Brief Description, Paragraph 1** – Please change Figure 1-1 to Figure 1-2 as noted in comment 1.
4. **Page 7, Section 2.1 Site Name, Location, and Brief Description, Paragraph 1** – This paragraph states the former Naval Air Station (NAS) Quonset Point was transferred by the Navy to the RIEDC between 1975 and 1980. Please revise to state that the NAS was transferred to the General Services Administration (GSA) who in turn transferred the property to the RIEDC.

5. **Page 13, Section 2.3, Community Participation, Paragraph 2, Sentence 1** – “The Navy organized a RAB in October 1997 to review and discuss....” Please change to “The Navy organized a RAB in December 1993 to review and discuss....” The last Technical Review Committee (TRC) was held in late November 1993 and the first RAB meeting was held on 1 December 1993.
6. **Pages 21 – 23, Table 2-2, Summary of RI Results for COCs** – A column should be added that shows the regulatory standard for each compound for the media displayed so the reader can have some insight as to whether a constituent is at a level that might be of concern or not.
7. **Page 27 Table 2-3A, Receptors and Exposure Routes Evaluated in HHRAs** – There are two construction worker receptors (designated as current & future land use and the other with no designation) with similar and different exposure routes. Please clarify what the difference is between these two different construction worker scenarios. It is not evident from Table C-3 through C-6.
8. **Page 35, Section 2.7.1, Summary of Human Health Risk, Groundwater COCs, Last Paragraph** – This paragraph states that cobalt was not retained as a COC because only the maximum detected dissolved concentration reported for this metal (31.5 ug/l) exceeded the basewide background value of (24.9 ug/l). Please remove this statement as we have not yet concurred to use the background study values for this site which we agreed would be worked out during the remedial design.
9. **Page 39, Section 2.8, Remedial Action Objectives, Groundwater RAOs, Paragraph 1** – “For Site 16, PRGs were developed for COCs identified for unrestricted (residential) site use and for restricted (industrial/commercial) site use.” Please change to “For Site 16 PRGs were developed for COCs identified for unrestricted residential use and for site use restricted to industrial/commercial use.”
10. **Page 42, Section 2.9.1, Soil Alternatives, Existing Land Use Restrictions, Arrow 1** – Please provide a map of Parcel 7 and any other numbered parcels so the reader can understand where they are located and their boundaries.
11. **Table 2-7, Page 44, Summary of Remedial Alternatives Evaluated for Soil, Alternative S-2, LUCs and Five-Year Reviews, Sentence 1** - This sentence states that existing land use restrictions would be incorporated in the LUCs. The existing LUCs require that the site be used for “port related” activities. This is specific to the MARAD portion of Site 16. This would not include the portion of Site 16 that is north of the former Ash Street and south of Allen Harbor Road that contains the two piers, Sea Freeze Bldg and the main NORAD Bldgs as this area are not subject to the MARAD agreement. RIDEM’s concern is that the whole site be limited to industrial/commercial use, i.e. residential use is prohibited. From RIDEM’s standpoint any kind of industrial/commercial use of this land would be

acceptable. The only exception to this is the existing marina which is considered recreational use.

The MARAD portion of the site is an agreement between the US DOT and QDC. By incorporating the MARAD restrictions we would essentially be making us a part of that agreement as we would then have to determine whether any development is “port related”. The environmental LUCs for this site should be stand alone and not tied to any other restrictions. Essentially we want to allow for industrial/commercial use and restrict residential and recreational use except for the existing marina. Please revise this section to remove the references to existing LUCs.

12. **Table 2-7, Page 44, Summary of Remedial Alternatives Evaluated for Soil, Alternative S-2, 3, 3A, S-4 and S-5, LUCs and Five-Year Reviews** – For Soil Alternative S-3A in the LUCs and Five-Year review portion it is noted that “an additional LUC describing the extent of the WMA” is part of the alternative. This same statement is not included in alternatives S-2, S-3, S-4 and S-5. Please explain what makes Alternative S-3A different from the other alternatives, which have waste management areas, that it needs an LUC specific to it.
13. **Table 2-7, Page 47, Summary of Remedial Alternatives Evaluated for Soil, Alternative S-5** – This alternative should contain the section of LUCs and Five-Year Review for soil and note that no LUCs and five-year reviews would be required since we would clean the soil to residential standards.
14. **Page 61, Section 2.12.2, Description of Selected Remedy, Bullets 4 & 7** - These bullets state that existing land use restrictions would be incorporated into the LUCs. See comment #11.
15. **Page 63, Section 2.12.2, Description of Selected Remedy, Limited In-Situ Chemical Oxidation, Paragraph 2** - This paragraph states that quarterly sampling will take place for one year. RIDEM typically requires 2 years of data to help determine when the best time of year to monitor should occur. Please revise.
16. **Page 66, Section 2.12.2, Description of Selected Remedy, Monitored Natural Attenuation, Paragraph 5** – This paragraph states that cleanup levels are based on groundwater as a drinking water source and as a result do not apply to saline areas such as along the coast or along Allen Harbor where water is saline. We do need to develop cleanup levels in these areas to ensure there is no unacceptable risk to ecological receptors.
17. **Page 66, Section 2.12.2, Description of Selected Remedy, LUC, Arrow 1** - This arrow states that residential use will be prohibited throughout the entire site. This is true. There is also recreational use that will be allowed in the property associated with the existing marina, while in the rest of the site only industrial/commercial use would be allowed. Based on the way this section is written, one might conclude that recreational use would also be allowed over the entire site. Thus, some language

should be added to this section to note that recreational use will only be allowed within the existing property that the marina occupies. This clarification could be helpful in the future should a) the existing marina wants to expand or b) should someone want to develop another marina. under the MARAD agreement items a & b would be allowed.

18. **Appendix B, Cost Estimate, Item 3.2, Survey Report** – Though not a large cost, please state if this item includes the cost to survey the ten areas, under the selected Soil Alternative S-3A, that will be excavated to a depth of 2 feet and backfilled with clean soil. Also please state if this item includes the cost to survey the marina which is subject to a different type of land use than the rest of this site.

19. **Appendix E, Table E-3, Federal and State Action-Specific ARARs – Alternative S-3A, Soils, Page 5 of 5** – For the “Solid Waste Landfill Regulations – Monitoring” please change the citation from “DEM OWM SW04-01”, to “DEM OWM SW02”. SW04 is for incinerators and resource recovery facilities.

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, P.E.

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