

N62578.AR.002865
NCBC DAVISVILLE
5090.3a

U S NAVY RESPONSES TO U S EPA REGION I AND RHODE ISLAND DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT COMMENTS ON THE DRAFT RECORD OF DECISION
FOR OPERABLE UNIT 9 (OU 9) SITE 16 NCBC DAVISVILLE RI
3/17/2014
TETRA TECH

SITE 16 DRAFT OU9 ROD EPA RESPONSE TO COMMENTS

EPA Comment No. 1: This document has quite a few acronyms. While Navy does a good job of defining them the first time they are used, people not familiar with the NPL Site have to constantly flip back and forth to the definitions page. This creates confusion, frustration, and suspicion as to why this document is not as transparent as it could be. Please re-write and see attached suggestions.

Response to EPA Comment No. 1: *The document will be reviewed and revised, as necessary, to ensure that acronyms are being used consistently throughout the document. In addition the acronym list will be moved to the beginning of the document. The Navy appreciates the time and effort the reviewer has shown in pointing out certain inconsistencies in the use of terms and phrases in the document as well as numerous other edits and suggestions. Please note the Navy has reviewed all edits and suggestions in the furnished tracked changes version of the document and has accommodated the edits and suggestions as deemed appropriate and useful in eliminating perceived “confusion, frustration, and suspicion.”*

EPA Comment No. 2: Of particular note is that the ROD language needs to be consistent with Model ROD language the Region has recently developed. The Navy has also been asked to do this for the ROD this year at Newport.

Response to EPA Comment No. 2: *Please forward the referenced Model ROD language for Navy review. We understand that the Model ROD language is a “work in progress” by the EPA and has not yet been distributed. We are unaware of this Model ROD language being present in any draft or final ROD between EPA Region I and the Navy.*

EPA Comment No. 3: While generally objective, the ROD downplays potential interconnections and interrelationships between Site 16 and releases located in upgradient areas. Please note that while important to the CSM, these relationships have no bearing on the need for remedial action at the Site 16 soil and former Building 41TCE groundwater plume in the overburden, the focus of this ROD. The upgradient releases include sites 01/02/03/04, the CED area, and the NIKE site. It should be noted that all of these sites are directly hydraulically upgradient of Site 16 and ground water data demonstrates clear hydraulic interconnections. Although conclusive evidence for contemporary co-mingling of upgradient contamination with the Site 16 plume was not demonstrated by the Navy’s RI/FS, EPA’s analysis of previously supplied information suggested possibility for direct ongoing input of contaminants from the upgradient areas via pathways in deep overburden and bedrock groundwater, particularly from the NIKE site plume. Since technical consensus on this issue was never reached, it must also be reiterated that there remains considerable uncertainty regarding the potential for *present* input of contaminants from upgradient sources, and even more uncertainty in regards to *future* inputs from these same sources, or as-yet undiscovered sources such as the drum cache recently identified in the area between the NIKE Site and Site 16. It would be advisable, therefore, to acknowledge these uncertainties directly, and to emphasize that robust LTM will be a critical element of remedial measures, moving forward, in order to address these uncertainties.

Response to EPA Comment No. 3: *The Navy acknowledges the EPA’s concerns regarding this subject. However, the Navy is confident in the conclusions reached concerning upgradient contaminant contributions as summarized in the Final Remedial Investigation (RI) (March 2009) and the Final Feasibility Study (FS) (May 2012). The RI/FS conclusions are further supported and corroborated by evaluations presented in the U.S. Army Corps of Engineer New England District Draft RI Report (October 2011) for the Nike PR-58 Site (upgradient of Site 16). The extensive, multi-phase investigations conducted in this area by both the Navy and USACE confirm that, while there is minor hydraulic connection between Site 16 and the NIKE PR-58 Site area, there is no evidence that upgradient sources are contributing significantly to the CVOC groundwater plume underlying Site 16 or that they will do so in*

the future. Currently, low-level CVOC contamination only (below MCLs) is present in the upgradient portions of Site 16 (near the intersections of Davisville and Thompson Roads). The Navy agrees with EPA's statement that there is no co-mingling of the CVOC plumes (i.e., the upgradient plume does not reach the CVOC plume near former Building 41). Therefore, the Navy respectfully disagrees with the EPA conclusion that there is "considerable" uncertainty regarding the potential for present and/or future input from off-site sources. The Navy does agree that the long-term monitoring program (LTMP) for Site 16 could include the monitoring upgradient of Site 16 and the Conceptual Site Model (CSM)/LTMP be modified to reflect that data, as necessary. No changes to the ROD are proposed.

EPA Comment No. 4 - Page 4, § 1.4: Add to the bullets in § 1.4 "Long-term groundwater monitoring of the areas where contaminated soil will be left in place under the soil covers will be required even after groundwater cleanup standards are achieved."

Response to EPA Comment No. 4: Agree unless additional testing of soil shows that leaching of contaminants is unlikely to impact groundwater. Also, it is anticipated that any such long-term monitoring would be very limited in scope and frequency.

EPA Comment No. 5 - Page 4, § 1.5: Add the following statutory determination paragraph from the Region's revised model ROD language:

"The selected remedy will reduce exposure levels to protective ARAR levels or, in the absence of protective ARAR levels, to within EPA's generally acceptable risk range of 10^{-4} to 10^{-6} for carcinogenic risk and below the HI of 1 for noncarcinogens in soil and groundwater, as outlined in Tables 2.4 & 2.5 {Soil and Groundwater Clean-Up Levels}."

Response to EPA Comment No. 5: Please see Navy response to EPA Comment No. 2.

EPA Comment No. 6 - Page 6: Please put EPA's signature block on a separate page. The text on that page should be changed as follows: "This Record of Decision documents the selected remedy for OU9 by the Navy and EPA with the concurrence of the State of Rhode Island. Concur and recommend for implementation."

Response to EPA Comment No. 6: Agree. EPA's signature block will be put on a separate page and the text will be revised as requested.

EPA Comment No. 7 - Page 7: Please include a table of contents.

Response to EPA Comment No. 7: Agree. A table of contents will be added to the ROD.

EPA Comment No. 8 - Page 9 - Section 2.2, Site History and Enforcement Activities, Table 2-1: Previous Investigations and Site Documentation, page 9; EPA initiated additional investigations designed to assess the potential for contaminant migration onto Site 16 from upgradient areas (NIKE, Site 03/04) which should be included on Table 2-1. For example, on EPA's behalf, USGS performed a number of geophysical studies (MASW seismic) in the western portion of Site 16 in 2008 and EPA collected a series of groundwater quality profiles. This information, which strongly supports input of contaminants to Site 16 from the adjacent upgradient areas, was communicated to the BCT in a number of formats (e.g., *Initial Interpretation of Site 03 Data Gap Reconnaissance Investigation*, PowerPoint presentation to BCT, January 2, 2009). Please add appropriate representative references to this work onto Table 2-1.

Response to EPA Comment No. 8: The Navy acknowledges that EPA has performed additional investigations regarding the potential for contaminant migration from upgradient areas onto Site 16 and has provided this information in various formats. With respect to the "Initial Interpretation of Site 03 Data Gap Reconnaissance Investigation", cited in the EPA comment, since the U.S. Army Corps of Engineer New England District performed the work that was outlined in the cited presentation, the Navy will include the subsequent Draft RI Report (October 2011) from the U.S. Army Corps of Engineer New England

District in Table 2-1 in order to provide a more comprehensive understanding of contamination in the upgradient areas.

The following will be added after the "FS Support Field Investigation" entry –

Draft RI Report for the Nike PR-58 Site (USACE)	2007-2011	Field work occurred between May 2007 and 2011. Pertinent to Site 16, site-wide groundwater flow and contaminant migration pathways were investigated and analyzed in order to assess the contaminant fate and transport pathways likely to occur between these two sites. During the summer of 2009, in conjunction with EPA and the USGS, the USACE installed and sampled numerous wells (well clusters including overburden and bedrock wells based on geophysical screening) in the immediate upgradient location of Site 16 (west of Thompson Road). Primary conclusions of the Draft RI (relevant to Site 16) include: 1) Davol Pond (including the eastern unnamed portion) is hydraulically connected to the groundwater flow systems; 2) primary contaminant migration pathways are north-south oriented (not to the southwest, toward Site 16); 3) CVOC concentrations below MCLs are migrating into upgradient portions of Site 16 near the intersection of Davisville and Thompson Roads; and 4) there is no co-mingling of the off-site and Site 16 source area groundwater CVOC plumes.
---	-----------	--

EPA Comment No. 9 - Page 13, §2.4: Also include OU10 (QDC Outfall 0001) as being in the RI/FS process. Please note that the current FFA schedule for the completion of the RI/FS process at both OU7 & OU10 is in FY 2015.

Response to EPA Comment No. 9: Respectfully disagree. There is no FFA schedule for either OU7 or OU10. It is possible that the EPA is referring to the planned dates in CERCLIS.

EPA Comment No. 10 - Page 13, Figure 2-4 and Section 2.4, Scope and Role of Operable Unit, 5th paragraph: The text refers to Sites 02 and 03 and Study Areas 01 and 04, mentioning that, "these four sites are located immediately northwest of Site 16 and Contamination detected at these and other sites has not impacted the Site 16 area." Based on groundwater profiling completed in 2008, EPA respectfully disagrees with this statement. Further, future "impacts" cannot be ruled out given the present uncontrolled nature of these significant upgradient releases. Please see also general comments above. Please also consider revising Figure 2-4 (Conceptual Site Model for Site 16) to reflect these uncertainties.

Response to EPA Comment No. 10: Respectfully disagree. It is unclear to the Navy what is meant by "present uncontrolled nature of these significant upgradient releases" with respect to contaminant migration onto Site 16. The upgradient chemical releases of concern cited occurred decades ago and it is unlikely that significant CVOCs would migrate onto Site 16. Please also see Navy Response to Comment No. 3. No changes/revisions to the text or Figure 2-4 are proposed.

EPA Comment No. 11 - Page 14, §2.5: Also include the acreage of Site 16 (both soil and groundwater contamination-p17 states 31 acres of groundwater contamination), whether or not there are any historical or archeological areas of importance and the presence of 100-year or 500-year floodplains.

Response to EPA Comment No. 11: Agree. The requested information will be added.

EPA Comment No. 12 - Page 15, Figure 2-4: The boundary shown for Site 16 should include the entire area under the contaminated groundwater plume.

Response to EPA Comment No. 12: Agree. The boundary of Figure 2-4 will be revised.

EPA Comment No. 13 - Page 16, Section 2.5.1, Physical Characteristics, 5th paragraph: Determination of the origin of “weathered bedrock” is complicated by the drilling process which can inadvertently introduce unconsolidated materials from upper parts of the borehole to lower intervals. As such, please consider rewording, as follows, “...suggesting that the weathered bedrock may have been locally transported by glacial action rather than weathered in place.” While opportunities for directly observing the weathered bedrock are rare, an outcrop exposed at the I-95/Route 4 Interchange shows a transitional contact from overburden materials to weathered bedrock to unweathered bedrock, suggesting an in-situ origin.

Response to EPA Comment No. 13: Agree. The text will be edited as proposed by EPA.

EPA Comment No. 14 - Page 16, Section 2.5.1, Physical Characteristics, 6th paragraph: The text indicates that, “it is generally assumed that large-scale (site-wide) interconnection of fractures also occurs.” As such, there is a potential for inter-connection between upgradient contaminant releases in bedrock, e.g., NIKE site, and downgradient portions of Site 16. Given the uncertainties presented by the limited bedrock characterization, robust LTM will be needed moving forward. Please consider augmenting the text in appropriate areas to indicate this. Please see also, general comments above.

Response to EPA Comment No. 14: Disagree. The text is accurate as written. No changes are proposed. Please see Navy Response to Comment No. 3.

EPA Comment No. 15 - Page 17, Section 2.5.2, Nature and Extent and Fate and Transport of Contamination; 3rd paragraph: Robust LTM will be needed to insure that VOCs, PAHs, and other contaminants originating or passing through Site 16 do not impact surface water and sediment in Allen Harbor and/or Narragansett Bay in the future. Please see also, general comments above.

Response to EPA Comment No. 15: Please see response to general comments above. The LTM program for Site 16 will be designed to appropriately and efficiently collect data to confirm remedy protectiveness.

EPA Comment No. 16 - Page 16, Section 2.5.2, Nature and Extent and Fate and Transport of Contamination; VOCs; 4th paragraph: The text states that, “analytical data for upgradient wells suggest that no significant CVOC contamination is entering the Site 16 area from other upgradient sites such as the CED Area or the Army Nike PR-58 site.” As discussed in comments above, there is considerable uncertainty regarding inputs of CVOC from upgradient sources, and as such, the accuracy of this statement rests on one’s interpretation of what one considers to be “significant”. Future conditions will require robust LTM to confirm the present conclusions given the present uncontrolled nature of these significant upgradient releases.

Response to EPA Comment No. 16: Disagree. Please see Navy Response to Comments No. 3 and No. 10.

EPA Comment No. 17 - Page 16, §2.5.2: Remove the last sentence since whether or not there is contamination in the overburden or bedrock coming from upgradient will be evaluated during the LTM and is an area of uncertainty.

Response to EPA Comment No. 17: Disagree. The text is accurate as written. No changes are proposed. Please see Navy Response to Comment No. 3.

EPA Comment No. 18 - Page 18, Figure 2-5; Section 2.5.2, Nature and Extent and Fate and Transport of Contamination; VOCs; 1st paragraph: The text states that, “the CVOC plume has not migrated to Allen Harbor in the shallow zone,” and that CVOCs have not been detected at “significant concentrations” in ground water seeps discharging to Allen Harbor. These statements seem to be at

odds with Figure 2-5 which indicates “shallow overburden” TCE concentrations in the harbor area. Please see general comments above. Ongoing LTM will be required to verify conditions in adjacent surface water and sediment.

Response to EPA Comment No 18: *Comment acknowledged. However, the text is accurate as written. While the piezometers installed to measure groundwater beneath Allen Harbor are generally reflective of shallow groundwater monitoring well depths, the data on Figure 2-5 indicates that the observed contamination is not migrating to the Allen Harbor via the shallow groundwater underlying the NCA. Rather, CVOCs are present in the piezometers beneath Allen Harbor because of upward vertical migration within Allen Harbor from greater depths. The text will be modified to acknowledge/explain this vertical migration. The Navy agrees that the LTM should be designed to verify conditions in the adjacent surface water and sediment of the NCA.*

EPA Comment No. 19 - Page 18, Section 2.5.2, Nature and Extent and Fate and Transport of Contamination; Biodegradation; 3rd paragraph: The apparent rapid attenuation of VOCs in the water column is reassuring, but should be verified over time through LTM. Please see previous comment, and general comments above.

Response to EPA Comment No. 19: *Please see response to general comments above and response to EPA Specific Comment No. 15.*

EPA Comment No. 20 - Page 18, Section 2.5.2, Nature and Extent and Fate and Transport of Contamination; PAHs; 5th paragraph: Given the PAH detections in groundwater, LTM should include PAH analysis to verify conditions in adjacent surface water and sediment remain un-impacted.

Response to EPA Comment No. 20: *The LTM program for Site 16 will be designed to appropriately and efficiently collect data to confirm remedy protectiveness.*

EPA Comment No. 21 - Page 18, Figures 2-7 and 2-8 and Section 2.5.2, Nature and Extent and Fate and Transport of Contamination; Metals; 6th paragraph: The text states that, “the spatial distribution of the metals data for groundwater suggests that the concentrations are not strongly related to releases from Site 16 source areas.” This appears to be at odds with the data which shows a general correlation with the identified release areas in the NCA. Please clarify. Inspection of Figures 2-7 and 2-8 does also indicate small hotspots which are beyond the limits of the identified release areas, and perhaps warrant additional discussion.

Response to EPA Comment No. 21: *The referenced sentence is discussing the spatial distribution of metals in groundwater and is reporting the conclusions presented in the remedial investigation report for groundwater. However, the referenced paragraph also discusses the metals detected in soils and Figures 2-7 and 2-8 display the arsenic and lead concentrations in soils across the NCA. The text regarding the soils indicates that “most”, not all, elevated metals concentrations are associated with soils in the northwestern portion of the site, most identified release areas are within or adjoin this portion of the site (e.g., the creosote dip tank, the former, fire-fighting training area, the septic tank removal area, the BTEX “hot spot” area). Therefore, as indicated by the reviewer, there is a general correlation between the release areas and the metals concentrations in soils. A sentence will be added to the text stating that there is a general correlation between known release areas and metals concentrations in soils. Also, a sentence will be added stating that elevated metals concentrations in soils outside the known release areas may be associated with the debris (e.g., metal debris) underlying a significant portion of the north central area.*

EPA Comment No. 22 - Page 23, §2.6: Are there any wells in the area withdrawing groundwater for commercial/industrial purposes, irrigation or other non-residential uses?

Response to EPA Comment No. 22: *Numerous studies have indicated that there are no wells within (or immediately adjacent to) Site 16 that are withdrawing/using groundwater for any purpose.*

EPA Comment No. 23 - Page 26, §2.6: In this section note what the coastal floodplain elevation is and how much of the Site is within the floodplain.

Response to EPA Comment No. 23: *Agree, in part. The FEMA Flood Insurance Rate Map (FIRM) provides the base flood elevation for the 100-year flood, but, not the elevation for the 500-year flood, to indicate their coverage. Per the FIRM, approximately 20 percent of the NCA is covered by the 100-year flood and nearly all of the NCA is covered by the 500-year flood. The referenced text will be modified accordingly.*

EPA Comment No. 24 - Page 33, sediment risks: EPA has not approved the anthropogenic background for this Site; please reword the sentence to state that there are no CERCLA risks in the sediments.

Response to EPA Comment No. 24: *Agree. As discussed on page 33, cancer risks for exposures to PAHs in sediments by recreational users do exceed EPA's target risk range. However, sediment was not retained as a media of concern because the forensic study determined the PAHs in Allen Harbor sediment were primarily associated with non-site related activities (e.g., the marina, road run-off). The last sentence in the discussion of sediment risks will be revised to read as follows: "Additionally, RI evaluations, including the forensic study of Allen Harbor sediments, concluded that Site 16 is not the primary source of contaminants in sediment (i.e., the sediment risks are not due to releases at Site 16.)." The last part of the sentence (regarding local anthropogenic background levels) will be deleted.*

EPA Comment No. 25 - Page 35: "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 groundwater value (24.9 ug/L)." Please remove this sentence because it does not make grammatical sense. CERCLA does not allow for removal of COCs due to exceedances of background; generally if something exceeds background that is a reason to clean it up. EPA researched this contaminant and believes it should be retained as a COC as was recommended in the RI dated March 2009. EPA does not agree with the FS page 2-13 that due to its limited detections over the RSL of 11 ppb it should not be carried through the FS. Cobalt was detected at least in 81 wells with over 20 percent of those detections above the RSL of 11 ppb. At the very least cobalt should be included in the LTMP.

Response to EPA Comment No. 25: *The sentence will be deleted and cobalt will be added as a COC for groundwater.*

EPA Comment No. 26 - Page 40, Table 2-3: For lead, footnote 3 cites SDWA regulations (the MCLs) at 40 CFR 141 (subpart G), but lead is not addressed under this subpart of the regulations. Whatever regulatory standards are used need to be identified in this Table and in the Chemical-specific ARARs Table. For Nickel the Basis should be "RIDEM GA Level" rather than "RIDEM DEC."

Response to EPA Comment No. 26: *The Navy assumes this comment is referring to Table 2-5 and not Table 2-3. For lead the footnote will be revised to reference 40 CFR 141 Subpart I. For nickel "RIDEM DEC" will be changed to "RIDEM GA Level".*

EPA Comment No. 27 - Page 42, 1st paragraph: Add to the end of the second sentence: "to confirm that contaminated groundwater is not migrating beyond the groundwater compliance boundary for the WMA."

Response to EPA Comment No. 27: *Mostly agree. However, the phrase will be modified to state: ... "contaminated groundwater is not migrating beyond the compliance boundary at concentrations that would pose unacceptable risk to aquatic receptors."*

EPA Comment No. 28 - Page 42, "Existing Land Use Restrictions": This section should only discuss existing restrictions within the area of the operable unit. If the Parcels discussed are within the operable

unit that should be a figure added to show where they are. Please send the actual language from the Transfer documentation for our review. What is meant by “when the site is closed under CERCLA” in the last sentence in the first paragraph? Is that when five-year reviews are no longer needed? Since Navy has several distinct groundwater plumes above MCLs (OUs 7, 8, & 9) and a landfill (OU1) that will take many years to clean up, if ever, it is unclear as to why this language is proposed to be included in this ROD. Please explain.

Response to EPA Comment No. 28: *A figure depicting the referenced parcels (Parcel 8 and the Lease Area relevant to Site 16) will be added to the ROD. The Transfer and Lease documentation was provided via email from D. Barney to C. Williams dated 1/30/14. The end of the referenced sentence regarding closure under CERCLA will be modified as follows:… “within Parcel 8, until all necessary response action is completed at all Operable units at NCBC Davisville.” The information on existing land use restrictions has been included to provide a more comprehensive understanding of the Site 16 history and because such information may assist in the development of actual environmental land use restrictions for Site 16.*

EPA Comment No. 29 - Page 44: Please include in this ROD the actual language Navy is proposing be included in the OU9 LUC RD that is in the existing land use restrictions.

Response to EPA Comment No. 29: *The performance objectives of the LUC RD are presented on page 66; it is premature to expect the exact language at this time. The level of detail provided regarding the LUCs is sufficient and appropriate for the ROD.*

EPA Comment No. 30 - Page 44, Table 2-7: In the third sentence of the Details text for the LUCs and Five-Year Reviews remove “prevent residential use of the marina area, allow for recreational use associated with the marina,” [as long as the cover is maintained, any use of the area is permissible under CERCLA].

Response to EPA Comment No. 30: *Disagree. This was specifically requested by RIDEM and negotiated with Navy in the presence of EPA. Also, please note that, from a risk assessment perspective, the marina area was evaluated as part of the northwestern section of the NCA. Soil RAO No. 3 is relevant to the marina area.*

EPA Comment No. 31 - Page 44, bottom of page and 46 Alternative S-4: If the Navy is including a WMA in Alternative S-3, Navy should also include the same sentence under LUCs as is in alternative S-3A on the bottom of page 45. “...with an additional LUC describing the extent of the WMA.”

Response to EPA Comment No. 31: *Agree, with clarification. The reference to the LUC describing the extent of the WMA should also appear in Alternative S-2. Therefore, only the text for Alternative S-2 will be revised regarding this LUC because, for the other alternatives, the text refers either directly or indirectly to the Alternative S-2 discussion.*

EPA Comment No. 32 - Page 45, Table 2-7: For the Details text for Off-Site Disposal add: “Non-hazardous waste will be disposed of at a licensed off-site solid waste facility.”

Response to EPA Comment No. 32: *Agree.*

EPA Comment No. 33 - Page 45, Alternative S3A, Excavation: Please include the cleanup levels. Will the soil be excavated in areas of contamination above residential or industrial cleanup levels?

Response to EPA Comment No. 33: *Agree. It is Navy’s understanding that “include the cleanup levels” means to include “industrial” or “residential” remedial goals, and, in this case, “industrial” will be added.*

EPA Comment No. 34 - Pages 46 and 47: Please explain why if soil above residential cleanup levels will be excavated to the water table, why will subsurface contamination remain at the site needing LUCs similar to Alternative S-2? Additionally on page 4-23 of the May 2012 FS this alternative also included

removal of all soil above GA leachability criteria. Therefore no CERCLA WMA would be needed.

Response to EPA Comment No. 34: *No action needed. The bottom of page 46 is Alternative S-5. The top of page 47 is Alternative S-6. The subject reference to LUCs applies to Alternative S-6.*

EPA Comment No. 35 - Page 47: Please include a description of soil Alternative S-6 that was included in the draft final FS dated May 2012.

Response to EPA Comment No. 35: *No action needed. The text at the top of page 47 is a condensed version of the description of Alternative S-6 from the FS.*

EPA Comment No. 36 - Page 47, Table 2-8: For Process Options for Monitored Natural Attenuation add: “, sampling and analysis.”

Response to EPA Comment No. 36: *Disagree with clarification. The current text needs to be revised and actual text should be: “Naturally Occurring Biodegradation, Dilution, and Changes in Geochemistry” per Table 3-2 of the FS.*

EPA Comment No. 37 - Page 49, top of page: The description of Alternative S-5 includes a WMA on page 47. Please clarify why groundwater cleanup would need to be accomplished across the entire Site 16 area under this GW-2 alternative.

Response to EPA Comment No. 37: *No action needed. The top of page 47 describes Alternative S-6, not Alternative S-5. Alternative S-5 is described on page 46.*

EPA Comment No. 38 - Page 49, Alternative G-2, LUCs: Please provide the exact language that Navy proposes to include from the existing land use restrictions. EPA cannot sign a ROD without knowing exactly what Navy is proposing to include from a document we did not review.

Response to EPA Comment No. 38: *Please see Navy Response to EPA Comment No. 29.*

EPA Comment No. 39 - Page 53, 1st paragraph: In the last sentence remove: “and prohibit residential uses and”.

Response to EPA Comment No. 39: *Agree. The residential use prohibition is included in the previous sentence and, therefore, is redundant in this sentence and will be deleted. The preceding sentence will be revised by adding the following at the end: “... of the NCA/marina.”*

EPA Comment No. 40 - Page 53, 2nd paragraph: Alternative S-1 will not include any LUCs, so it would not be protective. Existing LUCs are not environmental so cannot be included in the alternative. Please re-write the paragraph. Alternative S-1 needs to be analyzed for all of the NCP criteria.

Response to EPA Comment No. 40: *Disagree. The paragraph notes the limited protection currently provided and, then, the last sentence makes it plain that the alternative would not be fully protective. And since it does not meet this threshold, there is no need to discuss Alternative S-1 further.*

EPA Comment No. 41 - Page 55, 3rd paragraph: Regarding the fourth sentence, how can LUCs address exceedances of leachability standards?

Response to EPA Comment No. 41: *The last half of the subject sentence will be revised as follows:*

“...and exposure to remaining contaminants that may leach from the soil into the groundwater would be addressed by the groundwater LUCs described in Section 2.12.2 which prohibit the use of groundwater

for consumptive use.”

EPA Comment No. 42 - Page 56, Table 2-11: The Alternative G-2 ARAR criterion dot should have a “does not meet” symbol (300 years for groundwater cleanup is not reasonable under EPA MNA guidance standards).

Response to EPA Comment No. 42: *Disagree. The actual phrase in the guidance is “within a timeframe that is reasonable compared to other alternatives”. The subject text and evaluation was consistent with the FS and Proposed Plan. As noted later in the comparative analysis, the long time is a sufficient reason to eliminate the alternative as the selected remedy.*

EPA Comment No. 43 - Page 57: Alternative G-1 will not include any LUCs, so it would not be protective. Existing LUCs are not environmental so cannot be included in the alternative. Please re-write the paragraph. Alternative G-1 needs to be analyzed for all of the NCP criteria.

Response to EPA Comment No. 43: *Disagree. See response to No. 40. The paragraph notes the limited protection currently provided and, then, the last sentence makes it plain that the alternative would not be fully protective. Since the alternative does not meet this threshold, there is no need to discuss Alternative G-1 further.*

EPA Comment No. 44 - Page 57: Compliance with ARARs, Alternative G-2 will not meet EPA MNA guidance standards to a remedy that will take a reasonable period of time to reach cleanup standards compare with alternatives that include active treatment.

Response to EPA Comment No. 44: *Disagree. See the response to Comment No. 42.*

EPA Comment No. 45 - Page 60: The groundwater plume is highly mobile, but due to the dissolved nature of the contamination it is considered a low level threat waste, not a principle threat waste. Please re-write the sentence.

Response to EPA Comment No. 45: *Agree. The last sentence will be replaced with the following.*

“At Site 16, the contaminant concentrations are not high enough to be considered “source material” and there was no evidence of DNAPL; therefore, principal threat wastes are not present at the site.”

EPA Comment No. 46 - Page 60, § 2.12.1: In the third bullet remove “and prohibit residential uses and”.

Response to EPA Comment No. 46: *Agree.*

EPA Comment No. 47 - Page 61, § 2.12.2: In the fourth bullet remove “and marina.” In the seventh bullet change “residential uses of the site” to “residential uses of groundwater within the site”.

Response to EPA Comment No. 47: *First part: Disagree. RIDEM requested the reference to the marina. Second part: Agree.*

EPA Comment No. 48 - Page 61: Please clarify if the total volume of soil to be removed under this ROD is 3,200 cubic yards or 3,660 cyds.

Response to EPA Comment No. 48: *The 3,200 cubic yard quantity includes the soil excavated in the vicinity of the marina building. The subject text will be revised as follows:*

“The total volume of soil to be excavated (including soil from the vicinity of the marina building described below) will be approximately 3,200 cubic yards.”

EPA Comment No. 49 - Page 63: The Cover paragraph should also explain that the Navy will maintain the 2-foot cover over the excavated areas and will conduct long-term monitoring to ensure the cover remedy remains protective.

Response to EPA Comment No. 49: *Agree. Text will be revised accordingly.*

EPA Comment No. 50 - Page 66, 3rd paragraph: Navy may not want to be so prescriptive when describing the type of sampling technique to be employed across the site forever until an ESD is written to change the type of sampling technique.

Response to EPA Comment No. 50: *Agree. The sampling method will be deleted.*

EPA Comment No. 51 - Page 66, LUCs: In the first sentence of the first bullet change “throughout the site” to “within the NCA.”

Response to EPA Comment No. 51: *Agree.*

EPA Comment No. 52 - Page 67: Add a new LUC bullet: “establish restrictions, enforceable by the Navy, on properties that the Navy has already transferred to private parties.”

Response to EPA Comment No. 52: *Agree. However, the word “private” will be changed to “other”.*

EPA Comment No. 53 - Page 67: OSWER Directive 9355.6-12 should be cited rather than the Navy principals.

Response to EPA Comment No. 53: *Disagree. The text will be modified to state...“and other DoD, Navy, and EPA guidance as appropriate”.*

EPA Comment No. 54 - Page 67: Please change the number of days the Navy has to submit the LUC RD work plan as the Davisville FFA§ 17.6 states that the RD work plan is to be submitted within 21 days after ROD signature.

Response to EPA Comment No. 54: *This comment actually illustrates a conflict within the FFA. Section 14.9, “Deadlines and Schedules,” gives Navy 21 days to provide a **schedule** for the LUC/RD, not the RD itself. The 21-day timeframe is also at variance with the EPA ROD checklist (OSWER Directive 9355.6-12, No. 9) which affords 90 days for submission of the LUC/RD document. The Navy will change the language in the ROD to reflect the time provided in Section 14.9 of the FFA.*

EPA Comment No. 55 - Page 67, §2.12.3: Revise this section to include the following Regional Model ROD language for groundwater:

The primary expected outcome of the selected remedy is that the groundwater will be restored to its permissible, beneficial use and will no longer present an unacceptable risk to human health.

The effectiveness of the groundwater remedy will be determined based upon attainment of the cleanup levels outlined in Table 2-5, as well as any additional site-related Contaminants of Concern (COCs) added through subsequent decision documents. A monitoring program will be implemented in order to evaluate remedy performance and progress towards attainment. The details of the monitoring program will be established during the remedial design phase and will include the preparation of a long-term monitoring plan, but initial monitoring is expected to include evaluation of all site-related contaminants such as {VOCs, SVOCs, & metals}. Monitoring scope and frequency could change over time based on

technical analysis of the remedy, optimization studies, revised conceptual site model, or other information, as determined by the Navy with approval from EPA and RIDEM.

The determination that all cleanup levels have been met should consider historical and current monitoring data, contaminant distribution, trend analysis, and the appropriateness of the compliance monitoring program (*i.e.*, locations, frequency of monitoring, sampling parameter). After all groundwater cleanup levels (as shown in Table 2.5) have been met, the Navy will evaluate risk to consider any additive risk from remaining COCs considering all potential routes of exposure to document the residual risk based on exposure to groundwater at the site. The residual risk evaluation will document the potential risk associated with the concentrations of the COCs remaining in groundwater at the site (if detected).

Response to EPA Comment No. 55: *Please see Navy response to EPA Comment No. 2. However, the Navy may decide to evaluate residual risk as suggested in the reviewers comment.*

EPA Comment No. 56 - Page 69, §2.13: Please include the words, “current and” before the term hypothetical future risks in the first sentence.

Response to EPA Comment No. 56: *Agree.*

EPA Comment No. 57 - Page 69, § 3.1.3: Add the following statutory determination paragraph from the Region’s revised model ROD language:

“The selected remedy will reduce exposure levels to protective ARAR levels or, in the absence of protective ARAR levels, to within EPA’s generally acceptable risk range of 10^{-4} to 10^{-6} for carcinogenic risk and below the HI of 1 for noncarcinogens in soil and groundwater, as outlined in Tables 2.4 and 2.5 {Soil and Groundwater Clean-Up Levels}.”

Response to EPA Comment No. 57: *Please see Navy response to EPA Comment No. 2. Also, reference to 3.1.3 appears to be a typo; there is no Section 3.1.3. Therefore, it is unclear where the proposed text is to be placed.*

EPA Comment No. 58 - Table E-1, p. 4: For the Remediation Regulation citation add: “Table 2;” Synopsis text add “and leaching” after “direct contact;” and in the Action to be Taken text also describe how the selected remedy will address exceedances of leachability standards.

Response to EPA Comment No. 58: *Agree. The subject changes will be made. The Evaluation column will be revised to state that leachability criteria are addressed through the WMA such that groundwater standards do not need to be met within the WMA.*

EPA Comment No. 59 - Table E-2, p. 1: For the Action to be Taken Text for the Floodplain Management/Wetland Protection citation change: “The Navy will solicit public comment as part of the proposed plan and wetland resources” to “The Navy solicited public comment as part of the proposed plan... and wetland resources. No comments were received.”

Response to EPA Comment No. 59: *Agree.*

EPA Comment No. 60 - Table E-2, p. 2: Move the Remediation Regulation citation to the Remediation Regulation citation in Table E-1 [changed to E-3] since the regulations are chemical [changed to action]-specific, not location-specific standards. [Comment reflects EPA requested changes in EPA email of 2/27/14]

Response to EPA Comment No. 60: *Agree with clarification. This ARAR will be moved as suggested; however, this ARAR was included in the location-specific table in the FSA.*

EPA Comment No. 61 - Table E-3, p. 2: Move the Remediation Regulation citation to the Remediation Regulation citation in Table E-1 since the leachability standards are part of the chemical-specific ARAR requirements.

Response to EPA Comment No. 61: *Agree with clarification. This ARAR will be moved as suggested; however, this ARAR was included in the location-specific table in the FSA.*

EPA Comment No. 62 - Table E-4, p. 2: In the Action to be Taken text for both the MCLs and MCLGs change the second sentence so that it just discusses how the groundwater alternative will be affected by being paired with Soil Alternative S-3A and remove the last sentence which discuss Soil Alternative S-5 that was not chosen for the remedy.

Response to EPA Comment No. 62: *Agree. The text will be revised as suggested.*

EPA Comment No. 63 - Table E-4, p. 3: In the Action to be Taken text for the Remediation Regulations change the third sentence so that it just discusses how the groundwater alternative will be affected by being paired with Soil Alternative S-3A and remove the last sentence which discuss Soil Alternative S-5 that was not chosen for the remedy.

Response to EPA Comment No. 63: *Agree. The text will be revised as suggested.*

EPA Comment No. 64 - Table E-5, p. 1: For the Action to be Taken Text for the Floodplain Management/Wetland Protection citation change: "The Navy will solicit public comment as part of the proposed plan and wetland resources" to "The Navy solicited public comment as part of the proposed plan... and wetland resources. No comments were received."

Response to EPA Comment No. 64: *Agree. The text will be revised as suggested.*

EPA Comment No. 65 - Table E-5, p. 2: Move the Remediation Regulation citation to the Remediation Regulation citation in Table E-4 [changed to E-6] since the regulations are chemical [changed to action]-specific, not location-specific standards. [Comment reflects EPA requested changes in EPA email of 2/27/14]

Response to EPA Comment No. 65: *Agree with clarification. This ARAR will be moved as suggested; however, this ARAR was included in the location-specific table in the FSA.*

EPA Comment No. 66 - Table E-6, pp. 3&4: In the Action to be Taken text for both the MCLs and MCLGs change the second sentence so that it just discusses how the groundwater alternative will be affected by being paired with Soil Alternative S-3A and remove the last sentence which discusses Soil Alternative S-5 that was not chosen for the remedy.

Response to EPA Comment No. 66: *Agree. The text will be revised as suggested.*

**Navy Response to Rhode Island Department of Environmental Management
Comments on NCBC Site 16 Draft Record of Decision Dated January 2014 for the
Former Naval Construction Battalion Center (NCBC) Davisville
Davisville, Rhode Island
(RIDEM Correspondence Dated February 19, 2014)**

RIDEM Comment No. 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.

Navy Response to RIDEM Comment No. 1: Agree. However, please note that the referenced graphic on page 2 was included more as a "header" to Section 1, not a stand-alone figure. Therefore, it was not assigned a figure number. The figure on Page 2 will be numbered Figure 1-1, and the current Figure 1-1 on Page 3 will be renumbered to Figure 1-2.

RIDEM Comment No. 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.

Navy Response to RIDEM Comment No. 2: The referenced text about soil covers, inspections, and subsurface soils will be revised to read: "disturbance of soil covers and subsurface soils is prohibited without prior authorization, soil covers are inspected and maintained". The referenced arrow will also conclude with the statement a "Soil management plan will be implemented to address any disturbance to the soils and covers".

RIDEM Comment No. 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.

Navy Response to RIDEM Comment No. 3: Agree. Figure 1-1 will be changed to Figure 1-2. Please see Navy Response to RIDEM Comment No. 1.

RIDEM Comment No. 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.

Navy Response to RIDEM Comment No. 4: Agree. The revision will be made. The revised text will read as follows:

Adjoining the southern boundary of the Main Center is the decommissioned Naval Air Station (NAS) Quonset Point, which was transferred by the Navy to the General Services Administration who in turn transferred the property to the Rhode Island Port Authority (RIPA) [now known as the Rhode Island Economic Development Corporation (RIEDC)] and others between 1975 and 1980.

RIDEM Comment No. 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.

Navy Response to RIDEM Comment No. 5: Agree. The revision will be made. The revised text will be:

The Navy organized a RAB in December 1993 to review and discuss NCBC Davisville environmental issues with local community officials and concerned citizens.

RIDEM Comment No. 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.

Navy Response to RIDEM Comment No. 6: Disagree. This table presents the chemicals of concern (COCs). By definition, COC is a chemical that has been detected at concentrations that are high enough to be of some concern (e.g., the chemical was identified as a “risk driver” in the human health risk assessment; the chemical was detected at concentrations greater than an ARAR). Cleanup levels are provided later in Tables 2-4 and 2-5. They are not being discussed at this stage of the ROD.

RIDEM Comment No. 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.

Navy Response to RIDEM Comment No. 7: The third row is redundant and will be deleted. The first row entry regarding construction worker inhalation shall read: *Inhalation of airborne particulates or VOCs from soils or VOCs migrating from groundwater (e.g., pooling in an excavation pit).*

RIDEM Comment No. 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.

Navy Response to RIDEM Comment No. 8: *The referenced statement will be removed.*

RIDEM Comment No. 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.”

Navy Response to RIDEM Comment No. 9: *In the context of this sentence, “restricted” is being used in the very general sense to be the opposite of “unrestricted”. The referenced text will be modified to delete the word “restricted” and the parentheses around “industrial/commercial”.*

The revised sentence will read: For Site 16, PRGs were developed for COCs identified for unrestricted (e.g., residential) site use and for industrial/commercial site use.

RIDEM Comment No. 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.

Navy Response to RIDEM Comment No. 10: *Agree. A figure similar to Figure 1-3 from the FS will be included.*

RIDEM Comment No. 11 - Table 2-7, Page 44, Summary of Remedial Alternatives Evaluated for Soil, Alternative S-2, LUCs and Five-Year Reviews, Sentence 1 (Part 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 Building and the main NORAD Buildings as this area is 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.

Navy Response to RIDEM Comment No. 11 (Part 1): The “Existing Land Use Restrictions” narrative, preceding Table 2-7 on page 42, summarizes the existing land use restrictions for Parcels 7 and 8. As a point of clarification, the information on those restrictions has been included to provide a more comprehensive understanding of the Site 16 history and because such information may assist in the development of actual environmental land use restrictions for Site 16. However, to clarify, the formal environmental land use restrictions (ELURs), specified in this ROD, are based on results of the CERCLA risk assessments for Site 16. (Based on EPA comments on the ROD for Site 16, the EPA concurs.) Consequently, for Site 16, residential land use restrictions for soils apply only to the NCA only (including the marina area).

RIDEM Comment No. 11 (Part 2): 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.

Navy Response to RIDEM Comment No. 11 (Part 2): The environmental land use restrictions will be stand alone and will be based on the outcomes of the CERCLA risk assessments. The referenced text will be modified accordingly.

RIDEM Comment No. 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.

Navy Response to RIDEM Comment No. 12: Agree. The WMA text will be added to the other alternatives, per the FSA.

RIDEM Comment No. 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.

Navy Response to RIDEM Comment No. 13: (Note that Alternative S-5 appears on page 46 but would carry over to page 47 if the comment were addressed affirmatively.) Agree. Rows for “LUCs” and “Five-Year Reviews” will be added to Alternative S-5 so that the comparison will be consistent with the other alternatives and will be more obvious.

RIDEM Comment No. 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 No. 11.

Navy Response to RIDEM Comment No. 14: Please refer to the response to RIDEM Comment No. 11 (Part 1).

RIDEM Comment No. 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 two years of data to help determine when the best time of year to monitor should occur. Please revise.

Navy Response to RIDEM Comment No. 15: Disagree. The monitoring described in the subject text refers to performance monitoring in the vicinity of the ISCO treatment, not the long-term monitoring. (The complete current sentences are: “Monitoring, including baseline sampling and quarterly sampling for one year, will be performed to evaluate the effectiveness of the chemical oxidation and to monitor for rebound. After the chemical oxidation step is completed, monitoring for MNA (described below) will begin.”) Therefore, no changes are proposed.

RIDEM Comment No. 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.

Navy Response to RIDEM Comment No. 16: No substantial change necessary. Protection of ecological receptors is addressed; the referenced text has been revised to read as follows: “Groundwater samples will be collected from wells near the shoreline where groundwater beneath Site 16 is saline, during the LTM. Screening levels protective of ecological receptors in surface water and sediment,

initially developed during the preparation of the Feasibility Study Addendum, will be confirmed during the RD.”

RIDEM Comment No. 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.

Navy Response to RIDEM Comment No. 17: Please see Navy response to RIDEM Comment No. 11. The referenced Arrow 1 is corrected to read: To prohibit residential uses throughout the NCA/marina area. The subject text will also be revised with the addition of the following as the second bulleted item:

- Allow recreational uses within the existing AHBA marina that are consistent with marina activities.

RIDEM Comment No. 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 two 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.

Navy Response to RIDEM Comment No. 18: Agree. The subject text in the “Item” column will be revised to: “Survey Support (Excavation Limits and LUC Boundaries)”.

RIDEM Comment No. 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.

Navy Response to RIDEM Comment No. 19: Agree. The correction will be made as provided in the comment.