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LETTER AND THE RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
COMMENTS AND THE U S NAVY RESPONSE ON THE DRAFT REMEDIAL INVESTIGATION
QDC OUTFALL 001 NCBC DAVISVILLE RI
08/07/2015
RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT



7 August 2015

Mr. Jeffery Dale
BRAC PMO Northeast
4911 So. Broad Street
Bldg. 679, PNBC
Philadelphia, PA 19112

RE: QDC Outfall 001 Draft Remedial Investigation
Navy Response to RIDEM 2 February 2015 Comments
Naval Construction Battalion Center
Davisville, Rhode Island
Submitted 2 June 2015, Dated 28 May 2015

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 to offer:

14. Figure 4-12, TPH Concentrations in Sediment – The following locations have **exceedances of RIDEM GB Leachability Criteria of 2500 mg/kg**: QF-SD06, 07, 08, 09, 10, 11, 13, 14, 15, 18, 19, 20 and 24 ranging from 2,730 to 15,000 mg/kg. The following locations have **exceedances of RIDEM upper concentration limits of 30,000 mg/kg**: QF-SD14, 19 and 20 ranging from 38,100 to 118,000 mg/kg. Irrespective of the results of the risk assessments, TPH contamination must be addressed.

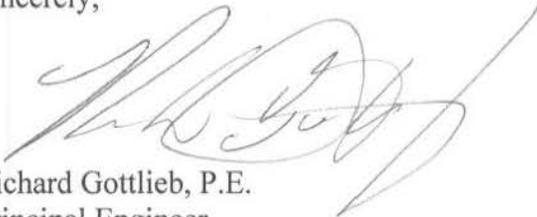
Navy Response – The RIDEM GB Leachability Criteria are not applicable to sediment. TPH contamination will be addressed in the FS.

RIDEM Response – Navy is correct that RIDEM does not have leachability criteria specific to sediment. Some form of remedial action, however, must be performed for the high levels of THP in the sediment. Navy would have the option of developing leachability standards for sediment at this specific location, simply using the existing RIDEM leachability criteria, or removing the TPH. Based on previous discussions between Navy, USEPA and RIDEM

it appears the Navy is electing to remove the TPH from the sediment which RIDEM finds to be acceptable.

RIDEM looks forward to working with the Navy and USEPA on this site. 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,

A handwritten signature in black ink, appearing to read 'Richard Gottlieb', written over a light blue horizontal line.

Richard Gottlieb, P.E.
Principal Engineer

Cc: M. Destefano, DEM OWM
C. Williams, EPA Region 1
D. Barney, US Navy
S. King, QDC
S. Licardi, ToNK
R. Shoemaker, Resolution