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NCBC DAVISVILLE
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LETTER AND THE U S EPA REGION I REQUEST FOR PERFLUORINATED COMPOUND
TESTING AT U S NAVY SITE 11 AT THE FORMER NCBC DAVISVILLE RI
03/17/2016
U S EPA REGION I BOSTON MA



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NEW ENGLAND - REGION I
5 POST OFFICE SQUARE, SUITE 100 (OSRR 07-03)
BOSTON, MASSACHUSETTS 02109-3912

March 17, 2016

Jeffrey Dale
BRAC PMO NE
4911 South Broad Street
Philadelphia, PA 19112-1303

Re: Request for Perfluorinated Compound Testing at Navy Site 11 at the Former Davisville Naval Construction Battalion Center (NCBC), Rhode Island

Dear Mr. Dale:

The U.S. Environmental Protection Agency (EPA) is evaluating the storage, use and potential release of perfluorinated compounds (PFCs) at CERCLA sites. PFCs have been identified by EPA as "emerging contaminants", defined as "contaminants and chemicals or materials that pose a perceived or real threat to human health or the environment, and either do not have a published health standard or have a health standard that is evolving or being evaluated". At this time, EPA has issued Provisional Health Advisory (PHA) values for two PFCs, perfluorooctanoic acid (PFOA) and perfluorooctaine sulfonate (PFOS), 0.4 ug/L and 0.2 ug/L, respectively.

The Navy site 11 "Firefighting Training Area" was identified by Navy on a document titled: "DoD Inventory of Fire/Crash Training Area Sites" (see attached). Since Fire Fighting Foam containing PFCs may have been used during the firefighting training activities, EPA is herein requiring that a Preliminary Assessment (PA), including a Historical Records Search, be conducted to identify all areas at which PFCs have been stored, used, or released at or associated with the Davisville NPL site including but not limited to site 11. This request is also made in accordance with The Davisville FFA. Results of the PA will be used to identify locations warranting further investigation (i.e. data collection) in accordance with the "Additional Work" provisions set forth in the FFA.

Specifically, EPA is requesting Navy investigate if PFCs were used and if a release has occurred in accordance with Paragraph 7.9 of the FFA, which states that

"Following finalization of any Primary document pursuant to Paragraph 7.8 above, any party may seek to modify a report, including seeking additional field Work, pilot studies, computer modeling or other supporting technical Work only as Provide in 7.9 (a) and (b). A party may seek to modify a report after finalization if it determines, based on significant New Information, (i.e. information that become available, or conditions that

became known, after the report was finalized), that the requested modification is necessary. Any Party may seek such a modification by submitting a concise written request to the Project Managers of the other Parties. The request shall specify the nature of the requested modification and the Significant New Information upon which the requested modification is based....Modification of a document shall be required only upon a showing that...the requested modification could be of significant assistance in evaluating impacts on human health or the environment, in evaluating the selection of Remedial Action alternatives, or in protecting human health and the environment...."

The Primary document that needs to be modified under FFA section 7.9 is:
Phase II RI, Draft Nov 1993, Draft-Final July 1994

and possibly modified if a PFC release is documented:

Human Health Risk Assessment, Draft June 1996 Final Nov 1996 for soil and for groundwater Draft June 1997 F May 1998
Phase I Feasibility Study Report: Group IV - Site 02 and 03, Group V - sites 07&09, Group VII - site 11, Draft January 1993
Detailed analysis of Alternatives Report for site 10 Camp Fogarty Disposal Area, site 11-Fire Fighting Training Area, Draft May 1994
Proposed Remedial Action Plan, Draft August 1996 Final July 1998

EPA requests that a work plan for the PA be submitted by June 30, 2016, followed by completion and submittal of the Preliminary Assessment by August 31, 2016.

If you have any questions with regard to this letter, please contact me at (617) 918-1384.

Sincerely,



Christine A.P. Williams, RPM
Federal Facilities Superfund Section

cc: Richard Gottlieb, RIDEM
Dave Barney, Navy BEC
Nichole LaFontaine, Planner, ToNK
Steven King, Managing Director Quonset -Davisville Development Corporation
Nora Conlon, EPA (via e-mail only)
David Peterson, EPA (via e-mail only)
Rick Sugatt, EPA (via e-mail only)
Andrew Glucksman, EPA contractor Mabbett (via e-mail only)
Robert Shoemaker, Navy contractor Resolution (via e-mail only)

DoD Inventory of Fire/Crash Training Area Sites

(as of the end of FY 2014)

DoD Component	State	Installation Name	Fund Source	Site ID	Site Name
Navy	Florida	WHITING FIELD NAS	DERA	SITE 00122	WHITING FIELD NAS
Navy	Florida	WHITING FIELD NAS	DERA	SITE 00124	WHITING FIELD NAS
Navy	Georgia	KINGS BAY NSB	DERA	SITE 00002	KINGS BAY NSB
Navy	Guam	AGANA NAS	BRAC	SITE 00012	AGANA NAS
Navy	Guam	GUAM NAVACTS	DERA	SITE 00014	GUAM NAVACTS
Navy	Guam	GUAM NAVACTS	DERA	SWMU 00022	GUAM NAVACTS
Navy	Guam	NSA ANDERSEN GUAM	DERA	SITE 0025A	
Navy	Guam	NSA ANDERSEN GUAM	DERA	SITE 0026A	
Navy	Guam	NSA ANDERSEN GUAM	DERA	SITE 0078A	
Navy	Guam	NSA ANDERSEN GUAM	DERA	SITE 0078B	
Navy	Guam	NSA ANDERSEN GUAM	DERA	SITE 0078C	
Navy	Guam	NSA ANDERSEN GUAM	DERA	SITE 0078D	
Navy	Guam	NSA ANDERSEN GUAM	DERA	SITE 0078E	
Navy	Guam	NSA ANDERSEN GUAM	DERA	SITE 0078F	
Navy	Hawaii	BARBERS POINT NAS	BRAC	SITE 00013	BARBERS POINT NAS
Navy	Hawaii	BARKING SANDS PMRF	DERA	SITE 00001	BARKING SANDS PMRF
Navy	Hawaii	BARKING SANDS PMRF	DERA	SITE 00004	BARKING SANDS PMRF
Navy	Hawaii	KANEOHE BAY MCB	DERA	SITE 00004	KANEOHE BAY MCB
Navy	Hawaii	PEARL HARBOR NS	DERA	SITE H0007	
Navy	Hawaii	PEARL HARBOR NS	DERA	SWMU 00006	PEARL HARBOR NS
Navy	Illinois	GLENVIEW NAS	BRAC	SITE 00001	GLENVIEW NAS
Navy	Illinois	GLENVIEW NAS	BRAC	SITE 00025	GLENVIEW NAS
Navy	Louisiana	NEW ORLEANS NAS	DERA	SITE 00004	NEW ORLEANS NAS
Navy	Maine	BRUNSWICK NAS	BRAC	SITE 00011	BRUNSWICK NAS
Navy	Maine	CUTLER NCTS	DERA	SITE 00001	CUTLER NCTS
Navy	Maine	CUTLER NCTS	DERA	SITE 00005	
Navy	Maine	CUTLER NCTS	DERA	SITE 00006	
Navy	Maryland	BAINBRIDGE NTC	DERA	SITE 00002	BAINBRIDGE NTC
Navy	Massachusetts	SOUTH WEYMOUTH NAS	BRAC	SITE 00004	SOUTH WEYMOUTH NAS
Navy	Mississippi	GULFPORT NCBC	DERA	SITE 00006	GULFPORT NCBC
Navy	Mississippi	MERIDIAN NAS	DERA	SITE 00001	MERIDIAN NAS
Navy	Mississippi	MERIDIAN NAS	DERA	SITE 00006	MERIDIAN NAS
Navy	Nevada	FALLON NAS	DERA	SITE 00001	FALLON NAS
Navy	New Jersey	COLTS NECK NWS EARLE	DERA	SITE 00011	COLTS NECK NWS EARLE
Navy	New Jersey	COLTS NECK NWS EARLE	DERA	SITE 00046	COLTS NECK NWS EARLE
Navy	New Jersey	TRENTON NAWC	BRAC	SITE 00002	TRENTON NAWC
Navy	New York	CALVERTON NWIRP	DERA	SITE 00002	CALVERTON NWIRP
Navy	North Carolina	CAMP LEJEUNE MCB	DERA	SITE 00009	CAMP LEJEUNE MCB
Navy	North Carolina	CHERRY POINT MCAS	DERA	SITE 00012	CHERRY POINT MCAS
Navy	North Carolina	CHERRY POINT MCAS	DERA	SITE 00029	CHERRY POINT MCAS
Navy	North Carolina	CHERRY POINT MCAS	DERA	SITE 00034	CHERRY POINT MCAS
Navy	Pennsylvania	PHILADELPHIA NS	BRAC	SITE 00013	PHILADELPHIA NS
Navy	Pennsylvania	WARMINSTER NAWC	BRAC	SITE 00008	WARMINSTER NAWC
Navy	Pennsylvania	WILLOW GROVE NAS	BRAC	SITE 00005	WILLOW GROVE NAS
Navy	Puerto Rico	PUERTO RICO NAVACT	BRAC	SITE 00017	NAVACT PUERTO RICO
Navy	Puerto Rico	PUERTO RICO NAVACT	BRAC	SWMU 00068	NAVACT PUERTO RICO
Navy	Puerto Rico	ROOSEVELT ROADS NS	DERA	SITE 00017	ROOSEVELT ROADS NS
Navy	Rhode Island	DAVISVILLE NCBC	BRAC	SITE 00011	DAVISVILLE NCBC
Navy	Rhode Island	NEWPORT NETC	DERA	SITE 00009	NEWPORT NETC