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NCBC DAVISVILLE
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LETTER AND THE U S EPA REGION I COMMENTS ON THE DRAFT EXPLANATION OF
SIGNIFICANT DIFFERENCES OPERABLE UNIT 8 (OU 8) CALF PASTURE POINT SOLVENT
DISPOSAL AREA SITE 7 FOR THE FORMER NCBC DAVISVILLE RI
08/22/2013
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

August 22, 2013

Jeff Dale, Dept of the Navy, BRAC PMO Northeast
Code 5090 BPMO NE/JD, 4911 South Broad St
Philadelphia, PA 19112-1303

Re: *"Draft Explanation of Significant Differences (ESD) OU 8 Calf Pasture Point Solvent Disposal Area (site 7) for the former Naval Construction Battalion Center, North Kingstown, Rhode Island"*, dated July 2013, North Kingstown Rhode Island

Dear Mr. Dale:

Pursuant to § 7.6 of the Davisville Naval Construction Battalion Center Federal Facility Agreement dated March 23, 1992, as amended (FFA), the Environmental Protection Agency has reviewed the subject document and comments are below.

GENERAL COMMENTS

1. A figure showing the location of the soil removal should be provided.
2. It is noted that the geographic location of the removal is distant both horizontally and vertically from the current groundwater hot spot. Therefore, Navy should rephrase the characterization of the removal from "the" source to "a" source. There is a most likely a continuing source of DNAPL to the plume.
3. The soil risk language from the RI should be added. A comparison of soil data before and after the removal action to the direct exposure criteria and leachability criteria should be tabulated and presented.
4. The soil ARARs from the site 16 FSA should also be added, (see tables 3-1 to 3-3 and EPA comments on these tables). They will include the RIDEM leachability criteria for TCE (applicable) and the EPA SSLs for chloroform (TBC guidance) since RIDEM doesn't have criteria for chloroform. We've included ARAR tables as an attachment for this comment letter for clarity.
5. An update of the groundwater ARARs is also provided should be included in the ESD for completeness:

6. I have also enclosed a red lined/strike out version of the ESD with additional word changes.

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, BEC (via e-mail only)
Johnathan Reiner, ToNK
Steven King, RIEDC
Dave Peterson, EPA (via e-mail only)
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