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LETTER AND COMMENTS FROM RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL
MANAGEMENT REGARDING DRAFT FINAL OUTFALL 001 DRAIN LINE INVESTIGATION
AND DATA REPORT NCBC DAVISVILLE RI

06/28/2011

RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT



RHODE ISLAND

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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TDD 401-222-4462

28 June 2011

Mr. Jeffrey Dale, RPM
BRAC PMO Northeast
4911 South Broad Street
Bldg 679, PNBC
Philadelphia, PA 19112

RE: Draft Final Outfall 001
Drain Line Investigation and Data Report
Naval Construction Battalion Center
Davisville, Rhode Island
Submitted 24 May 2011, Dated 20 May 2011

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:

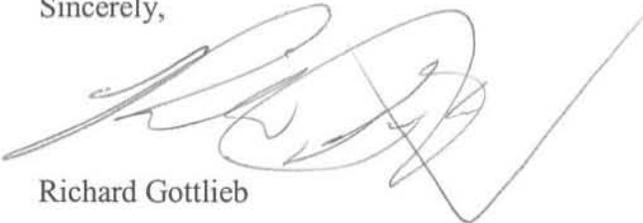
1. Page 2-1, Section 2.1 Drain Line Reconnaissance, Paragraph 2, Sentence 1 – This sentence references 9 catch basins depicted on Figure 2-1. Figure 2-1 only depicts 6 catch basins (CB-01, CB-02, CB-03, CB-09, CB-04 and CB-05) please provide a map delineating the other 3 catch basins.
2. Page 2-5, Section 2.5, Confirmatory Soil Sampling – This paragraph states that soil samples CS04 and CS05 were collected as five-point composite samples from the bottom of the excavation area. Please be advised that RIDEM does not accept composite samples.
3. General Comment – With respect to CB-08 please confirm that this catch basin is no longer active given that the inflow is from the former Building 224 (which has since been demolished) and the outflow is to CB-01 which has also been demolished. The body of the report does not indicate the status of CB-08
4. General Comment – A map should be provided delineating the entire drainage system. For example, at CB-02 there is a 12" line that originates at CB-07 which seems to connect into CB-06 based on picture A-3. The body of the report does not state if the CB-06 --- CB-07 – CB-02 connection is still active. The concern

is that CB-06 and CB-07 appear to be located in the former CED Drum Storage Area (Site 1). Soils exist at Site 1 that exceed RIDEM Remediation Regulations Residential Direct Exposure Criteria (RDEC). Similarly, there is an 18" line that enters CB-09 (Photo A-12) which is not shown on Photo A-11. Please show where the 18" drainage line originates from. In addition, invert elevations of all the catch basins should be provided.

5. General Comment – With respect to the residual material in the pipe line there are scattered exceedances of metals and PAHs at all sampling locations. The vast majority occur at sampling locations QF-RS04 and 05. At QF-RS04 there is also an exceedance of the GA Leachability Criteria for naphthalene. This could be a concern as the discharge from Outfall 001 most likely goes into Allen Harbor which is classified as a SA{b} water (For definition see RIDEM Water Quality Regulations, Dec 2010, Appendix A).
6. General Comment – RIDEM concurs with the Navy's recommendations for further investigation and remediation as noted in Chapter 4.

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

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