

N62578.AR.002844
NCBC DAVISVILLE
5090.3a

LETTER REGARDING RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL
MANAGEMENT COMMENTS ON REMEDIAL INVESTIGATION SAMPLING AND ANALYSIS
PLAN FOR QUONSET DEVELOPMENT CORPORATION OUTFALL 001 DRAIN LINE AND
ASSOCIATED CATCH BASINS NCBC DAVISVILLE RI

9/16/2013

RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

16 September 2013

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

RE: QDC Outfall 001 Remedial Investigation SAP
Risk Assessment
Navy response to RIDEM 13 June 2013 Comments
Naval Construction Battalion Center
Davisville, Rhode Island
Submitted 26 August 2013, Dated 22 August 2013

Dear Mr. Dale:

The Rhode Island Department of Environmental Management, Office of Waste Management (RIDEM) has reviewed the above referenced document. Comments on the sampling and analysis portion of the work plan were previously submitted on 9 May 2013. The following comments address the risk assessment portion of this work plan:

- 1. Section 1.1, Page 2, First Paragraph.** Text states that a culvert connects to an adjacent wetland and that this culvert is “plugged with soil and does not appear to be hydraulically connected to the tidal wetland to the east.” Considering that Study Area 01 was used to store 55-gallon drums of solvents and waste oil in the 1960s to 1974 and then was used as a leaching field that received storm water and surface water runoff from a truck-washing area located at Building 224 from December 1991 to April 1992, it is plausible that the culvert was once hydraulically connected during that time and may have transported contaminants to the tidal wetland to the east. It is recommend that Navy collect a sediment sample on the other side of the culvert, if possible, to confirm this assumption and verify whether flowage through this culvert may have historically impacted the tidal wetland.

Navy Response – One Additional sample will be collected in the area on the downgradient (east) side of the former location of the plugged culvert.

RIDEM Comment – Navy response is acceptable.

2. **Section 1.1, Page 2, Second Paragraph.** Text states that “access to the QDC Outfall 001 area is currently restricted by the chain link fence that surrounds the parking area located at the end of Marine Road”. Technically, this chain link fence impedes access but does not restrict access unless the QDC Outfall 001 area is completely surrounded by chain link fence. Please consider rephrasing for accuracy.

Navy Response – Text will be rephrased to state that the access “is impeded but not restricted... ..”

RIDEM Comment – Navy response is acceptable.

3. **Section 2.0, Page 5, Second Paragraph.** Navy proposes to evaluate risk from exposure to surface soils located 0 to 1 feet below ground surface (ft bgs), in accordance with United States Environmental Protection Agency (USEPA) risk assessment guidance. RIDEM Remediation Regulations, 2011 specify that surface soil is located from 0 to 2 ft bgs, that industrial/commercial direct exposure criterion (DEC) be applied to this depth range, and that this depth interval should be evaluated in the risk assessment. In addition, RIDEM residential DEC, if applicable (i.e., no land use restrictions are imposed on the site), as well as either GA or GB leachability criteria, must be met throughout the vadose zone. It is unclear in the report at what depth the water table is located and whether soils greater than 4 ft bgs are within the vadose zone. It is therefore recommended that surface soils be defined to include the 0 to 2 ft bgs depth interval and that soils located greater than 4 ft bgs be included in the human health risk assessment (HHRA) if they are located above the water table. Additionally, with respect to subsurface soils, please provide justification why evaluation of impacted soils located at depths greater than 4 ft bgs is not necessary.

Navy Response – Surface soil will be defined as 0-1 ft bgs in accordance with EPA Region 1 guidance, consistent with other sites being evaluated in this program.

In accordance with the Formal Dispute Resolution Agreement (January 12, 2012) between the Navy, EPA, and RIDEM, state Applicable or Relevant and Appropriate Requirements (ARARs) need to be addressed under CERCLA if the HHRA identifies an unacceptable site-related cumulative ELCR and/or total HI for a site. Therefore, as part of a remedial technology evaluation (e.g., Engineering Evaluation/Cost Analysis (EE/CA) or Feasibility Study (FS)), if the HHRA identifies any site-related risk-based COCs for the site, concentrations of chemicals detected on-site will be compared to RIDEM’s Method 1 Direct Exposure Criteria for Soil and RIDEMs’ Method 1 Groundwater Objectives (RIDEM, 2011) for the projected land use, as appropriate. Therefore, RIDEM’s Method 1 Objectives are not included in the Tier 1 COPC selection process. The Risk Assessment Technical Memorandum will be revised to state/clarify this.

Due to the site being mainly a wetland, the depth to water in the area where soil samples are being collected is very shallow/close to the ground surface. The maximum soil depth for evaluation in the HHRA (applicable for a construction/utility worker exposure scenario) was selected based on the deepest depth proposed for sampling to characterize the nature and extent. It is anticipated that the vadose zone does not extend deeper than 4 ft bgs adjacent to the wetland in the area of proposed soil samples. As stated in the response to specific comment 29, if evidence of impacts is observed in the 4 ft bgs soil interval, the borings at that location will be advanced until no evidence of impacts is observed. Soil data collected deeper than 4 ft bgs will be considered for evaluation in the HHRA if they are located above the water table (i.e., are in the vadose zone).

RIDEM Comment – Please be advised that RIDEM will have difficulty concurring with a risk assessment that has not evaluated risk in comparison to RIDEM criteria. Please also note that RIDEM DEC have been used as criteria to assist in the COPC selection process for risk assessments conducted at other Navy sites, such as at NETC. Therefore, please include DEC as COPC screening criteria.

With respect to subsurface soils greater than 4ft bgs please explain how the Navy will determine impacted soils from non-impacted soils while out in the field, i.e. what analytical methods would be used in the field. It is agreed the water table should be near the surface. To avoid later concerns, and save on resources, it is suggested that the borings be advanced to at minimum the top of the water table which should not incur any great additional cost.

4. **Section 2.0, Page 5, Third Paragraph.** Please provide justification for collecting soil and sediment samples to only 4 ft bgs. Construction and utility work could extend deeper than 4 ft bgs.

Navy Response – The maximum soil depth for evaluation of a construction/utility worker in the HHRA was selected based on the deepest depth proposed for sampling to characterize the nature and extent. A construction/utility worker is not likely to access deeper soils in a wetland area. As stated in the response to specific comment 29, if evidence of impacts is observed in the 4 ft bgs soil interval, the borings at that location will be advanced until no evidence of impacts is observed. Soil and sediment data collected deeper than 4 ft bgs will be considered for evaluation in the HHRA if they are located above the water table (i.e., are in the vadose zone).

RIDEM Comment – The response states that if impacts are observed at the 4 ft bgs soil interval the soil borings will be advanced until no evidence of impacts are observed. Please state what the Navy is defining as impacts.

In addition, Rhode Island Building Code (Ch 3, Table R301.2(1) 10th Edition) states the depth to frost line is 40". RIDEM regulates sewer construction in the state. It is unlikely that an individual septic disposal system (ISDS) would be approved in this area. Therefore, any proposed building would be required to connect to a sewer system. Typically 8" diameter sewer pipes are used and it is required they be installed below the frost line with 6" of crushed stone underneath the pipe. This brings the depth to a minimum of 4.5' and does not even account for sloping of the pipe to allow for gravitational flow. Therefore, it is very likely that construction workers would be exposed to soil below four feet below ground surface. Please note there are exceptions to the above requirement, such as a sewer pipe underneath a bridge, but this would require insulating the pipe which can be costly. The Navy should consider a deeper depth for construction worker soil exposure if the site assessment indicates contamination extends below 4' bgs.

5. **Section 2.0, Page 5, Fifth Paragraph.** Please define the screening interval of what will be considered a "deeper" well to be used for evaluation of potable water.

Navy Response – The only deep well that will be sampled as part of the RI is existing well PGU-Z3-03D, which has a sampling depth of 61 feet bgs according to the NIKE PR-58 RI Report. The exact well construction details will be included in the Final SAP.

RIDEM Comment – Navy response is acceptable.

6. **Section 3.0, Page 8, Sixth Bullet.** It is understood that USEPA Region 1 has not implemented (i.e., recommended) the use of the 2011 Exposure Factors Handbook (EFH) update. However, use of the September 2008 Child-Specific EFH has been widely implemented by USEPA. Please reference this guidance document in this section.

Navy Response – The USEPA Child-Specific Exposure Factors Handbook (2008) will be added as a referenced guidance document.

RIDEM Comment – Navy response is acceptable.

7. **Section 3.2.1, Page 10, Soil.** Please include the RIDEM residential and industrial/commercial DECs as soil screening levels.

Navy Response – In accordance with the Formal Dispute Resolution Agreement (January 12, 2012) between the Navy, USEPA, and RIDEM, state Applicable or Relevant and Appropriate Requirements (ARARs) need to be addressed under CERCLA if the HHRA identifies an unacceptable site-related cumulative ELCR and/or total HI for a site. Therefore, as part of a remedial technology evaluation (e.g., Engineering Evaluation/Cost Analysis (EE/CA) or Feasibility Study (FS)), if

the HHRA identifies any site-related risk-based COCs for the site, concentrations of chemicals detected on-site will be compared to RIDEM's Method 1 Direct Exposure Criteria for Soil and RIDEMs' Method 1 Groundwater Objectives (RIDEM, 2011) for the projected land use. Therefore, RIDEM's Method 1 Objectives are not included in the Tier 1 COPC selection process. The Risk Assessment Technical Memorandum will be revised to state/clarify this.

RIDEM Comment - Please be advised that RIDEM will have difficulty concurring with a risk assessment that has not evaluated risk in comparison to RIDEM criteria. RIDEM DEC and Groundwater Objectives have been used at other Navy sites (NETC) as COPC screening criteria. RIDEM therefore requests that these be included as screening criteria in this risk assessment.

8. **Section 3.2.1, Page 11, Sediment.** Although it is agreed that the dust inhalation pathway is a *de minimis* pathway for sediment, please provide an explanation in the text why this pathway is not applicable for sediment exposures. Additionally, the site-specific sediment adherence factor of 0.4 mg/cm² (fifth bullet) is lower and therefore less conservative than the recommended values provided in the Child-Specific EFH for children playing in sediment (e.g., hands, legs, and feet are 0.49, 0.71, and 21 mg/cm², respectively). Please provide justification for the basis and application of this adherence factor.

Navy Response – *An explanation will be provided in the text on why the dust inhalation pathway is a de minimis pathway for sediment. The Child-Specific EFH adherence factors for children playing in mud/sediment are not considered representative of the likely exposure at the site.*

The risk assessment exposure assumptions conservatively assume that hands, feet, and lower legs may come in contact with sediment. It is likely that children would not enter this area without shoes on. However, if they did, as is being conservatively assumed, in areas of the site/wetland where both feet and lower legs are likely to come into contact with sediment, the sediment is covered by surface water. Therefore, most of the sediment that may adhere to the skin as a child walks into the area is likely to be washed off as they exit it. In areas of the site where sediments are not covered by surface water, contact with the sediment is likely to be limited to less than the contact that is being assumed and evaluated in the risk assessment (i.e., bottom of feet or feet). Therefore, the adherence factors recommended in the Child-Specific EFH (or 2011 EFH) for children playing in mud/sediment are considered to overestimate the likely exposure to sediment at this site. It is indicated in the Child-Specific EFH that children playing in mud/sediment are based on play in tidal flats. This exposure scenario does not accurately reflect the exposure scenario for the area of the RI.

The proposed adherence factor of 0.4 mg/cm³ was calculated based on values recommended by EPA based on children exposure to wet soil. Therefore, this

adherence factor is considered adequately protective for likely exposure to sediment at this site.

An error was found on Table C-2, footnote (e). This footnote will be revised to reference use of the "Geometric mean of children playing in wet soil."

RIDEM Comment – Navy response is acceptable.

9. **Section 3.2.1, Page 12, Surface Water, 1st Sentence.** The text states that the wetland does not contain fish, although no mention of this is provided in Section 1.1. Please explain in the text why fish consumption should not be considered a relevant pathway.

Navy Response – *Text will be added to Section 1.1 to indicate that the wetland does not contain fish and provide discussion on why fish consumption is not considered a relevant pathway.*

RIDEM Comment – Prior to concurring with the response RIDEM would like to review the proposed language.

10. **Section 3.2.1, Page 12, Groundwater.** Please include the RIDEM GA and GB Groundwater Objectives as groundwater screening levels.

Navy Response – In accordance with the Formal Dispute Resolution Agreement (January 12, 2012) between the Navy, USEPA, and RIDEM, state Applicable or Relevant and Appropriate Requirements (ARARs) need to be addressed under CERCLA if the HHRA identifies an unacceptable site-related cumulative ELCR and/or total HI for a site. Therefore, as part of a remedial technology evaluation (e.g., Engineering Evaluation/Cost Analysis (EE/CA) or Feasibility Study (FS)), if the HHRA identifies any site-related risk-based COCs for the site, concentrations of chemicals detected on-site will be compared to RIDEM's Method 1 Direct Exposure Criteria for Soil and RIDEMs' Method 1 Groundwater Objectives (RIDEM, 2011) for the projected land use. Therefore, RIDEM's Method 1 Objectives are not included in the Tier 1 COPC selection process. The Risk Assessment Technical Memorandum will be revised to state/clarify this.

RIDEM Comment - Please be advised that RIDEM will have difficulty concurring with a risk assessment that has not evaluated risk in comparison to RIDEM criteria. Please see evaluation of response to Comments 3 and 7.

11. **Section 3.3.1, Page 13, Current/Future Recreational/Trespasser (Adult and Child), First Bullet.** RIDEM Remediation Regulations, 2011 specify that surface soil is located from 0 to 2 ft bgs. Please evaluate surface soils through inclusion of soil data representing the 0 to 2 ft bgs interval. Additionally, please explain why the dust inhalation pathway is considered to be insignificant.

Navy Response – *Surface soil will be defined as 0-1 ft bgs in accordance with EPA Region 1 guidance, consistent with other sites being evaluated in this program.*

Section 3.3.1 states that "exposure to volatile compounds in soil via the inhalation pathway is considered to be insignificant". However, the inhalation of fugitive dust/particulates from soil pathway is proposed for evaluation.

RIDEM Comment - **Please be advised that RIDEM will have difficulty concurring with a risk assessment that has not evaluated risk in comparison to RIDEM criteria. Please see evaluation of response to Comments 3 and 7.**

12. **Section 3.3.1, Page 13, Current/Future Recreational/Trespasser (Adult and Child), Second Bullet.** Please explain why the dust inhalation pathway is considered to be insignificant. (See Comment 11 above.)

Navy Response – *Additional explanation will be provided on why the dust inhalation from sediment pathway is considered insignificant.*

RIDEM Comment - **Navy response is acceptable.**

13. **Section 3.3.1, Page 13, Future Construction/Utility Worker, First Bullet.** RIDEM Remediation Regulations, 2011 specify evaluation of subsurface soil located from 2 ft bgs extending through the entire vadose zone. Please either include deeper soils in the risk assessment or provide further justification for exclusion of soils/sediments greater than 4 ft bgs.

Navy Response – *See response to specific comment 6.*

RIDEM Comment – **This comment addresses subsurface soil. RIDEM Comment 6 addressed 9/2008 Child-Specific Exposure Factors Handbook. Perhaps the Navy meant to reference RIDEM Comment 4 which addressed subsurface soil? If so, please see RIDEM Comment 4 to Navy Response 4.**

14. **Section 3.3.1, Page 14. Hypothetical Future Off-Site Resident.** If volatile organic compounds (VOCs) are detected in groundwater, then vapor intrusion into indoor air of off-property buildings may be a complete pathway. Please include inhalation of indoor air via vapor intrusion in the HHRA.

Navy Response - *The area surrounding the wetland is wooded and undeveloped, with the exception of the QDC bike path. As shown on Figure 10-3, groundwater flows to the northeast from the wetland toward the ASSF, underneath the bike path, toward Allan Harbor. This entire area is within the Federal Emergency Management Agency (FEMA) flood zone, (also shown on Figure 10-3). Therefore, future residential or commercial/industrial development of the on-site area and off-site area downgradient of the site is not likely to occur, making the*

future vapor intrusion pathway incomplete. If it is determined during the proposed investigation and evaluation that VOCs could migrate to current or future residential areas, RIDEM's comment will be revisited/reconsidered.

RIDEM Comment – The site is close to the border between Navy/QDC land and private land to the north of Sanford Road. Though unlikely, it is possible for someone to place a well and this area and transport the water off site. This would provide the pathway for on site water to be transported to off-site residences. (There are houses on the other side of Sanford Road along Allen Harbor Landfill). Thus to make this risk assessment complete this possible scenario should be evaluated if VOCs are detected in groundwater.

15. **Section 3.3.1, Page 15, Calculation of Exposure Point Concentrations.** The text states that the arithmetic mean concentration will be used as the exposure point concentration (EPC) for lead, in accordance with EPA guidance. RIDEM recommends using the 95% Upper Concentration Limit (UCL) of the mean concentration as the EPC for lead for consistency with the approach to development of EPCs for other chemicals of potential concern (COPCs) and to address variability in concentration. Although it is acknowledged that EPA guidance (OSWER 9200.1-78; 2007) states the arithmetic mean should be used for comparison, it is noted that EPA also recommends in this document that “if a risk assessor seeks to provide a conservative estimate of the average concentration of lead present in yard soil, an upper bound estimate on the mean may be appropriate for that purpose.” (p. 1) The 95% UCL would therefore be an appropriate EPC, considering the size of the site and potential variability in soil lead concentrations.

Navy Response - *The risk assessment is being conducted following EPA/CERCLA risk assessment guidance per Navy policy and approach taken on other Navy sites. Therefore, use of the arithmetic mean concentration for evaluation of lead is considered appropriate per EPA lead guidance.*

RIDEM Comment - RIDEM maintains that the 95% UCL should be used and is the appropriate way to evaluate the data, however, we know the Navy has used the arithmetic mean on other sites.

16. **Section 3.3.3.** Please define ELCR (i.e., ILCR) in text for clarity. Also, the text notes that cumulative cancer risks for construction workers, industrial workers, and recreational users will be compared to the USEPA's target risk range of 1×10^{-4} to 1×10^{-6} . However, the risks should also be compared to the State of Rhode Island cumulative cancer risk limit of 1×10^{-5} . Additionally, RIDEM states, for remedial goals, a cancer risk limit of 1×10^{-6} for individual carcinogenic compounds should be used (RIDEM Remediation Regulations, 2011, Section 8.01A). Navy should specify where risk for individual COPCs exceeds the RIDEM individual cancer risk limit.

Navy Response - *ELCR is defined earlier in the Risk Assessment Work Plan Tech memo in Section 3.2.1. However, the term will be redefined in Section 3.3.3, as requested. The risk assessment utilizes USEPA/CERCLA's target risk range and the determination of unacceptable risk will be made based on USEPA/CERCLA's target risk range. However, comparison to RIDEM's target risk levels will also be provided or informational purposes.*

RIDEM Comment – **Navy response is acceptable.**

17. **Section 4.2, Tier 1 – Ecological Screening Risk Assessment. Page 22, Third Paragraph.** Burrowing animals and plants with extended root systems may encounter soils located at depths greater than 1 ft bgs. If contamination is found below 1 ft bgs, please include an evaluation of deeper soils in the ecological risk assessment. With respect to the groundwater pathway, it is generally agreed that surface water is a more significant pathway for ecological receptors. However, there is the potential for ecological receptors to encounter groundwater via seeps or springs, particularly during drier portions of the year when surface water may not be available. Please provide a more thorough discussion of groundwater hydrology (or reference appropriate sections of the Sampling and Analysis Plan [SAP]) with respect to ecological exposures to rule out this pathway or include a quantitative evaluation of shallow groundwater.

Navy Response - *The 0 to 1 ft horizon is expected to be the most biologically active zone in soil and is therefore, the focus of the ERA. The Navy expects deeper soils to be saturated and therefore not applicable for exposure for burrowing animals or shallow roots. If the delineation of soil concentrations indicates higher concentrations in deeper soils (i.e., 1 to 2 ft, 2 to 4 ft), then additional evaluation of the deeper soils will be conducted to determine whether deep rooted plants and burrowing animals (if present) are likely to be impacted.*

It is expected that the evaluation of surface water present within the wetland will be representative of shallow groundwater that ecological receptors may encounter. The surface water will be considered as a drinking water source for birds and mammals and be evaluated in the wildlife food web model and will also be evaluated relative to surface water screening values protective of aquatic receptors.

RIDEM Comment – **Navy response is acceptable.**

18. **Section 4.2, Tier 1 – Ecological Screening Risk Assessment. Page 26, Footnote 1.** Footnote states that the average total organic carbon (TOC) concentration will be used for Eq-P based sediment screening levels. Although it is acknowledged that this is a practical approach, please take into consideration deriving sample-specific sediment benchmarks in cases where TOC concentrations may be highly variable within a site.

Navy Response - The range of TOC values detected in the sediment will be considered and, at a minimum, be discussed in the Uncertainty section. Sample-specific Eq-P based screening levels will be considered if the TOC results are highly variable across the exposure area.

RIDEM Comment - Navy response is acceptable.

19. **Section 4.3, Tier 2 – Baseline Ecological Risk Assessment. Page 30, Second Paragraph.** Please include consideration of background contaminant levels in the Tier 2 Baseline Environmental Risk Assessment (BERA).

Navy Response - *Background concentrations will be considered in the BERA if a suitable soil and wetland sediment data set is available.*

RIDEM Comment – Navy response is acceptable, however, it is noted in the work plan that background sediment samples are not proposed.

20. **Section 4.3.1, Step 3a COPC Refinement of Conservative Exposure Assumptions. Page 31, First Bullet, Last Sentence.** Concentration should be considered for constituents detected at a low-frequency because a single elevated concentration may represent an isolated source or a hot spot. Please modify sentence to indicate that a COPC evaluated at a low frequency and concentration may not warrant additional evaluation.

Navy Response - *It is understood that isolated hot spots may still represent areas of concern. The bullet will be modified to indicate that concentration data will be reviewed for COPCs with low FOD prior to exclusion from further evaluation to ensure that hot spots are not inadvertently excluded.*

RIDEM Comment – Navy response is acceptable.

21. **Table C-1, Parameters Used in the Sediment Pathway, Adherence Factor.** Please refer to Comment 8.

Navy Response – *Please see aforementioned response.*

RIDEM Comment - Navy response is acceptable.

22. **Table C-2, Child Recreational/Trespasser, Sediment Loading, Children Playing in Wet Soil.** Please refer to Comment 8. Additionally, the Child-Specific EFH provides a sediment loading (i.e., adherence factor) value for feet whereas this table used the value for hands as a proxy for feet.

Navy Response – *Please see aforementioned response.*

RIDEM Comment - Navy response is acceptable.

23. **Table C-3, Construction/Utility Worker, Exposure Duration.** Please note that the exposure duration to be used in the risk equations should be 1 year to be mathematically correct.

Navy Response - An exposure duration of 1 year is proposed for the RME scenario. A shorter exposure duration of 6 months is proposed for the CTE scenario.

RIDEM Comment – Navy response is acceptable.

24. **Table C-5, Ecological Screening Values – Soil.** The soil benchmarks for aluminum are pH-dependent, but the benchmark should be a pH of >5.5 (i.e., no adverse effect where pH>5.5). In accordance with the USEPA Soil Screening Level, aluminum should be included as a COPC if the pH is less than 5.5. Additionally, the SAP (Worksheet 17-1) does not include pH testing for soil samples. Please include pH testing of soil samples in the SAP.

Navy Response - Table C-5 will be clarified and sampling for soil pH will be added to the SAP.

RIDEM Comment – Navy response is acceptable.

25. **Table C-12, Exposure Parameters for Ecological Receptors.** Note that the home range and fraction dietary assumptions columns apply footnotes I and K to all receptors; however, these footnotes are applicable to only the bobwhite. Please provide the basis of assumptions for other receptors.

Navy Response - Table C-12 includes notes for each of the receptors which include details on each exposure parameter. Page numbers will be added so that it is clear that this table includes multiple pages.

RIDEM Comment – Navy response is acceptable.

26. **Figure C-2, Potential Exposure Pathways.** See Comments 3, 4, 11, and 13 regarding soil depth intervals and Comment 14 regarding vapor intrusion, and incorporate this information into the figure as warranted.

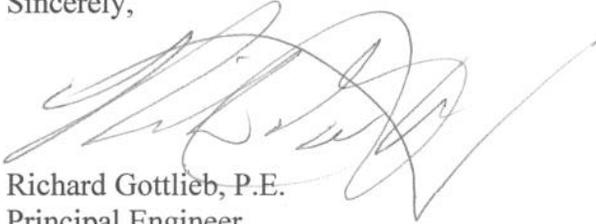
Navy Response - Figure C-2 will be updated based on any revisions proposed in the responses to comments provided.

RIDEM Comment – Navy response is acceptable.

RIDEM would like to thank you for your consideration of this matter 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,

A handwritten signature in black ink, appearing to be '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
L. McIntosh, Woodard & Curran
L. Sinagoga, Tetra Tech