



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203-0001

November 21, 1995

Mr. Philip Otis
U.S. Department of the Navy
Northern Division - NAVFAC
10 Industrial Highway
Code 1811/PO - Mail Stop 82
Lester, PA 19113-2090

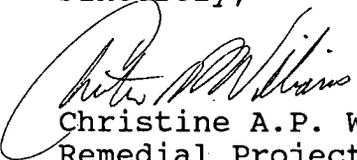
Re: Response to Comment Letter on Final Non Time-Critical
Engineering Evaluation/Cost Analysis (EE/CA) for Site 04 at the
former NCBC Davisville, Rhode Island, Dated November 13, 1995

Dear Mr. Otis:

The majority of the Environmental Protection Agency's (EPA) comments, dated August 10, 1995, on the Final EE/CA were satisfactorily addressed. A few minor comments are attached. However, we reserve the right to further comment on the responses to comments #2, 4, 5, 6, 8, 9, & 10 after receiving the Final Action Memorandum (AM), since the proposed revised text was not included in the response to comment document. To expedite review of the AM, the Navy should forward a redlined version of the document.

If you have any questions with regard to this letter, please contact me at (617) 573-5736.

Sincerely,


Christine A.P. Williams
Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: Christi Davis, Northdiv
Richard Gottlieb, RIDEM
Lou Fayan, NCBC
Tim Prior, USF&WL
Jayne Michaud, EPA



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EPA Comments on Response to Comment dated November 13, 1995

1. The Navy seems to have misunderstood EPA comment #5. The comment was intended to notify the Navy that 5 year reviews are not usually discussed in the removal action memorandum. Five year reviews may be required as part of a final remedy documented by a ROD for this site and the other 3 sites in that OU. As part of the section on contribution to remedial performance for this site it may be noted as to whether or not the site will need 5 year reviews based on the NCP section 300.430(f)(4)(ii) which states that "If a remedial action is selected that results in hazardous substances, pollutants, or contaminants remaining at the site above levels that allow for unlimited use and unrestricted exposure, the lead agency shall review such action no less often than every five years after initiation of the selected remedial action". The 5 year review discussion as stated now, in the description of the E.E./C.A., is inappropriate.
2. The Navy also seems to have misunderstood EPA comment #6. The Navy should include graphics that detail the amount of excavation expected in the trench during the removal action based on the cleanup levels of 10 ppm PCB and 500 ppm THP.
3. The Navy should provide a red-lined version of the Final Action Memo so the adequacy of the response to comments 2, 4, 5, 6, 8, 9, & 10 can be determined prior to the issuance of the action Memo.