



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

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August 8, 1994

Mr. Robert Krivinskas
U.S. Department of the Navy
Northern Division - NAVFAC
10 Industrial Highway
Code 1823 - Mail Stop 82
Lester, PA 19113-2090

Re: Additional Comments on the Draft Final Proposed Plan for
Sites 5 & 8 at Naval Construction Battalion Center, RI

Dear Mr. Krivinskas:

The purpose of this letter is to transmit my additional comments on the subject document. The schedule we had agreed to in the Allen Harbor meeting of June 16, 1994 had given us 2 weeks to review this plan. I received this draft plan a week late, (July 19 instead of July 12). The final plan was sent out on July 26 without addressing my preliminary comments, which I had faxed to you on Friday July 22, and without the final comments that I indicated would be sent by the 29th of July. The Navy should expect that EPA will use the full agreed to review times in future document reviews. I would hope that as we continue this process that we coordinate better in the future to address all outstanding issues before documents become final.

There are a few issues that need fleshing out in order to more fully explain our rationale for the limited action proposal. These issues will have to be dealt with in the language of the draft ROD.

1. There needs to be additional explanation that would indicate as to why the human health risk assessment (HHRA) for site 5 incorporated a 2 day exposure and the HHRA was calculated for site 8 with a 5 day exposure. As this is a departure from the normal way of calculating risks, additional explanation is needed. It has been explained to me that the 2 day scenario was used because Site 5 is located in a portion of the base that Navy personnel did not use on an every day basis and was not expected to be used on a day to day basis in the future.

2. There needs to be clarification as to why 2 HHRA's were done for Site 8 and only 1 was done for Site 5. As I understand the situation, the first round of sampling results were used in the risk calculations according with the expected future use at that time, the second round of sampling resulted in lower levels of contaminants at site 5 and so therefore the HHRA was not



that time; the second round of sampling resulted in lower levels of contaminants at site 5 and so therefore the HHRA was not revised. At site 8, however, the second round also included groundwater so the entire HHRA was revised in accordance with the guidance from the latest version of the base reuse plan and comment from the state requesting the 5 day exposure.

3. The groundwater under site 5 is not classified as GAA but that was not provided as an additional explanation as to why there were no groundwater studies done at this site also why there were no institutional controls placed on the groundwater at this site.

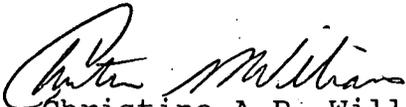
4. The final PRAP's additional explanation of why silver was found at 28 ppm at site 8 only once was not quite enough. As I understand the situation, when we went back to determine the extent of silver contamination, the additional samples in the **same** location showed significantly lower levels. This should explain that there was no hot spot in that area and with the other additional sampling it was determined that silver was not present in high concentrations across the site.

5. The sentence on page 17 of the PRAP which says that manganese in the groundwater is not related to site disposal activities, must be qualified by an explanation of where it is most likely coming from. It is not appropriate for the Navy to relieve itself of the obligation of cleaning up the manganese on this basis alone.

Additionally there were a few terms that needed definition: the 3 types of ARARs and EPA Priority Pollutants.

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

cc: Richard Gottlieb, RIDEM
Lou Fayan, NCBC
Mary Sanderson, EPA
Beth Tomasello, EPA