



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

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

N62578.AR.000404
NCBC DAVISVILLE
5090.3a

March 10, 1995

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: Comments on the Proposed Remedial Action Plan (PRAP) for
Sites 5 & 8, dated February 2, 1995, at Naval Construction
Battalion Center, RI

Dear Mr. Krivinskas:

Pursuant to § 7.6 of the NCBC Federal Facility Agreement (FFA),
please find attached the Environmental Protection Agency's (EPA)
comments on the above referenced document.

In order to speed up the review process, please fax me redlined
pages for our quick review of the wording changes. EPA expects
the Navy to provide a final PRAP for our quick review before the
PRAP is issued to the public.

The Navy did not incorporate comments dated August 8, 1994 into
this revision of the PRAP. The Navy also did not incorporate
applicable comments on the draft ROD dated Aug 26, 1994. I have
listed them for clarity in the attached comments.

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: Richard Gottlieb, RIDEM
Lou Fayan, NCBC
Bob DiBiccaro, EPA



EPA Comments, dated August 8, 1994, concerning the proposed plan for sites 5 & 8, which was issued for Public Comment on August 8, 1994

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 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. N/A

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

EPA COMMENTS, DATED AUGUST 26, 1994, ON THE DRAFT ROD FOR SITES 5 & 8

1.- 2. N/A

6. **Page 1:** Please provide the definition of DPDO the first time it is used in the text. (Defence Property Disposal Office)

7.-8. N/A

9. **Page 8:** In the first paragraph, the classification of GAA-NA, is not explained. Please provide an explanation.

10. In the section regarding the Site Use and Response History at Site 05, the Navy does not say what this area was really used for by the Navy. There is no context for the property, just that transformer oil was disposed of there. Add a sentence for explanation, such as: "This area has been used as a storage area for materials and equipment awaiting shipment."

11. N/A

12. **Page 8:** EPA Priority Pollutants should be more specifically defined to state where the list is found, such as: "The Priority Pollutants are the compounds or elements listed as the Toxic Pollutants list under the Federal Water Pollution Control Act, 4 FR 4402, July 30, 1979 as amended in 46 FR 2266, January 8, 1981 and 46 FR 10724, February 4, 1981."

13. **Page 10:** The second full paragraph on this page raises the issue of the silver contamination, but does not clearly explain it. I suggest adding a sentence, such as: "When the area surrounding this sample was resampled the analysis showed silver levels that were significantly lower."

14.-34. N/A

EPA Comments on PRAP dated February 2, 1995:

1. Page 1, add after the second sentence in the second paragraph: "Therefore, the Navy has separated the Sites 05 & 08 into two operable units (OUs), one for soils and one for ground water and is currently proposing...." continuing with the third sentence at this point.
2. Page 1, Second to the last sentence in the second paragraph; replace "within a second operable unit" with "after completion of the basewide groundwater remedial investigation (RI)".
3. Page 1, the last sentence in the second paragraph; This should be re-written to include the fact that the public comments and concerns raised on the basis of the previous PRAP as well as the public comments and concerns raised on the basis of this PRAP will be specifically addressed in the Responsiveness Summary of the ROD for these sites that will be forthcoming this summer. A suggestion would be to replace that sentence with, "Public comments and concerns raised on the basis of the previous Proposed Plan as well as comments submitted in connection with this Proposed Plan will be addressed in the Responsiveness Summary for this OU".
4. Page 3, the last sentence of paragraph 2.1 and Page 4 paragraph 2.4; Add the information that the transcript and all responses to all comments received during the last and this comment period will be included in the ROD Responsiveness Summary.
5. Page 3, Please refer to this alternative in a consistent manner. For example: In the first full paragraph, the first sentence, add "preferred" to No Action [preferred] alternative. In the first bulleted sentence add "No Action" to the Navy's [No Action] preferred alternative. "No Action" should also be added to the third and fourth bulleted sentences, the first sentence in the second paragraph and in the last full sentence on this page.
6. Page 3, Section 2.1; Delete the word formal in the title and in the third sentence.
7. Page 4, Section 2.4; add "in consultation with EPA and the State" in the first sentence after the word "public".
8. Page 8, third paragraph; Either remove this paragraph, or add that the ground water will be evaluated as a separate OU at both sites.
9. Page 8, paragraph 3.2; Add information to include the revised ERA has been submitted. The HHRA is included in Volume II of the RI.

10. Page 10, second full paragraph; Add a sentence to explain the one high hit of silver, such as, "The one sample of silver above ecological screening levels, but below human health screening levels may be viewed as an anomaly, since 18 of the other 20 samples were non-detect and the other sample where silver was detected was below both ecological and human health screening levels." (See also comments number 4 (Aug 8 comment letter) and 13 (Aug 26 comment letter)) above.
11. Page 10; Either delete the information about the ground water or add a sentence about the future investigations.
12. Page 12, third paragraph & 13, first full paragraph; the ecological risk assessment has not yet been fully evaluated at this time. EPA reserves comment on these two paragraphs.
13. Page 13, top of the page; add a sentence to provide information that the Navy will be further evaluating this further in the Base-Wide Ground Water studies expected to be completed this summer.
14. Page 13, Section 6, first paragraph, third sentence; add that the limited action was only site use controls.
15. Page 13, Section 6, first paragraph, fourth sentence; add that the Navy is continuing ground water studies.
16. Page 13, Section 6, first paragraph, fifth sentence; revise the sentence to read, "EPA uses the 10^{-4} to 10^{-6} risk range as a "target range" within which the Agency strives to manage risks at Superfund sites."
17. Page 13, Section 6, second paragraph; add a sentence after the first sentence to read, "The State of Rhode Island has proposed these lead regulations as **Applicable or Relevant and Appropriate Requirements (ARARs)** for Sites 05 & 08." Revise the next sentence to only use the acronym "ARARs" instead of spelling it out and deleting the words ",including the RI lead regulastions,".
18. Page 15; Add an additional paragraph after the last paragraph on this page, reading " The Navy has the authority to revisit the No Action decision even if the site is removed from the NPL. This could occur if future conditions indicate that an unacceptable risk to human health or the environment would result from the exposure to contaminants at the Sites".
19. Page 19, add the definition of the term "Superfund".