STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

Department of Environmental Management
DIVISION OF SITE REMEDIATION
291 Promenade Street
Providence, R.I. 02908-5767

25 July 1996

Mr. Philip Otis, P.E., Remedial Project Manager
US Department of the Navy, Northern Division
Code 18, Mail Stop #82
10 Industrial Highway
Lester, PA 19113-2090

RE: Draft Technical memorandum
Human Health Risk Assessment (HHRA)
For IR Program Sites 06, 10, 11, and 13
NCBC Davisville, Rhode Island
Submitted 1 July 1996, Dated June 1996

Dear Mr. Otis;

The Rhode Island Department of Environmental Management (RIDEM) Division of Site Remediation has reviewed the above referenced document and comments are attached. Pending the results for Site 13 confirmatory sampling the Division agrees with the conclusion of this document. Please be advised, however, that at Sites 06 and 10, where lead concentrations in soil exceeded 600 mg/kg, a lead management plan will be required.

If you have any questions or require additional information please call me at (401) 277-3872 ext. 7138.

Sincerely,

Richard Gottlieb, P.E.
Principal Sanitary Engineer

Attachment
cc: W. Angell, DEM DSR
C. Williams, EPA Region 1

lesan.rwg/rlwhg

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To MR. PHILIP OTIS	From R. GOTTLIEB
Co. U.S. NAVY	Co. RIDEM
Dept.	Phone # 401-277-3872 x 7138
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Comments For:

Draft Technical Memorandum
Human Health Risk Assessment (HHRA)
For IR Program Sites 06, 10, 11, and 13
Naval Construction Battalion Center
Davisville, Rhode Island

Dated June, 1998

1. **General Comment.**

   Please be advised that for Sites 06 and 10, where lead in soils exceeded 600 mg/kg, a lead management plan will be required.

2. **Page 25 and 26, Section 3.2, Establishing Toxicity Values for the Carcinogenic Effects of the COCs;**
   Last Bullet, Last Sentence.

   Footnote 5 is not found at the bottom of page 26. A footnote 5 is, however, found at the bottom of page 37 though this footnote does not seem to relate to page 26. Please check.

3. **Page 34, Section 4.2.5, Human Exposure Pathways (Future Commercial/Industrial Workers);**
   Paragraph 1, Last Sentence.

   The ground water could potentially be used as a source of drinking water, but this is unlikely at these sites because the aquifer is not classified as potable.

   Please note in the text that at Sites 06, 11, and 13 the groundwater is classified as GB, which with treatment, can be used for potable purposes. The ground water at Camp Fogarty (Site 10) is classified as GAA and therefore should be potable without treatment.

4. **Page 35, Section 4.2.5, Human Exposure Pathways (Future Commercial/Industrial Workers);**
   Paragraph 1, Sentences 2 and 3.

   These two sentences indicate that a worker is on site for eight hours per day and that exposure to soils is assumed to be 150 days per year. Typically, a full time worker is assumed to work 250 days per year. Please explain in the text why in this case a full time worker is only assumed to work 150 days per year.

5. **Page 35, Section 4.2.5, Human Exposure Pathways (Future Commercial/Industrial Workers);**
Paragraph 1, Last Sentence.

Please change "construction workers" to "Commercial/Industrial Workers".