

**RESPONSE TO EPA COMMENTS FOR DRAFT PROPOSED PLANS**  
**SITES 06, 11 & 10**

**General Comments**

**Comment:** 1. *The Navy should combine the public meeting for these proposed plans so that the Navy would hold 1 meeting for these sites in order to conserve resources.*

**Response:** The Navy will combine the public meeting for each proposed plan so that a single public meeting will be held for all three sites.

**Comment:** 2. *When will the Navy provide a revised Site 11 Soils specific ERA Evaluation to document the ERA summary included in this PP? Additionally, the Navy had agreed to provide site specific evaluations for the other sites either in the PP or as a separate document. The PP would be a cumbersome document if the Navy did incorporate this site specific evaluation, please provide a separate document. When will this information be available? The EPA can not agree with the Navy's proposal of no action until the administrative record is complete with the ERA site specific evaluations provided.*

**Response:** The schedule for release of the soils specific ERA for Sites 06, 10, 11, and 13 is currently in negotiation. The release of the ERA is pending resolution of site-specific issues regarding the document. The Draft Ground Water Evaluation, which included ground water underflowing Sites 06, 10 and 11 was released for comment on 8 October 1996.

**Comment:** 3. *The Navy should develop a "user friendly" fact sheet to accompany these technical proposed plans. Please provide the fact sheet with the draft final Proposed Plan for EPA Review.*

**Response:** A fact sheet will be developed for each proposed plan. As the preparation of this fact sheet is currently out of scope and not included in the schedule for this task, it may not be available for release with the draft final proposed plans. The fact sheets will be released for comment upon their completion.

**Specific Comments**

**Comment:** 4. *Site 10, §1, p. 1, last sentence; rewrite the last part of the sentence to read "Accordingly the Navy is proposing No further Action (NFA) for Site 10, Camp Fogarty Disposal Area." The 2 OU discussion is not relevant to the overall understanding of the proposed plan.*

**Response:** The text has been modified to state “Accordingly, the Navy is proposing NFA for Site 10, the Camp Fogarty Disposal Area” as requested. Please refer to page 1 of the enclosed redlined copy of the document for incorporation of this comment.

**Comment:** 5. *Site 10, §1, p. 2, 2nd sentence; The ROD is for Site 10; not Site 10 and the GW. Site 10 includes both the source and management of migration of the source area. Whereas the Site 06 and Site 11 source areas have been split from their respective possible groundwater migration pathways.*

**Response:** The text has been modified to state that the ROD is for Site 10 only. Please refer to page 1 of the enclosed redlined document for incorporation of this comment.

**Comment:** 6. *Site 10, §3.4.2, p. 11, ¶ 2 and p. 18, ¶ 1; add a sentence to include the State requirements for the periodic testing of these public supply wells.*

**Response:** The text of the document has been modified to state that the public supply wells are tested periodically in accordance with RI State Regulations, which parallel the guidelines set forth in the Safe Drinking Water Act. Please refer to pages 9 and 16 of the enclosed document for the incorporation of this comment.

**Comment:** 7. *Site 10, §3.4.3, p. 11, ¶ 1; add a sentence to inform the public that the contaminants found at the site were evaluated for human and ecological risks (Sections 3.4.4, 3.4.5, and 3.4.6) and impacts to public water supply to bely any fears the public may have when they read through the long list of contaminant detections found at this site.*

**Response:** The text of the document has been modified to include a statement which informs the public of the evaluations performed for the contaminants found at the Site. Please refer to page 10 of the enclosed document for the incorporation of this comment.

**Comment:** 8. *Site 10, §3.4, p. 15; replace the third paragraph on this page with a Site 10 specific paragraph from the PP for Sites 06 & 11, p. 17 third full paragraph, which begins:*

*As outlined in the National Oil and Hazardous Substances Pollution contingency Plan (NCP), acceptable risks at a superfund site are those associated with site contamination which fall within the range of one in ten thousand cancer and one in a million cancer risk ( $10^{-4}$  to  $10^{-6}$ ). All of the estimated maximum cancer risks associated with exposure to contamination at Site 10...*

**Response:** The text of the document has been modified to include a site specific paragraph regarding the summary of the risks present at Site 10 in relation to the EPA acceptable risk ranges. Please refer to page 13 of the enclosed document for incorporation of this comment.

**Comment:** 9. Site 10, §3.4, p. 16, ¶ 1, line 3; add the following after ...less than  $1 \times 10^{-6}$ :  
“...and are therefore within the EPA acceptable risk range.”

**Response:** Comment has been incorporated as shown on page 14 of the enclosed document.

**Comment:** 10. Site 10, §3.4, p. 16, ¶ 2, line 3; add “EPA” between the words “the” and “acceptable”.

**Response:** The text of the document has been modified, as shown on page 14 of the enclosed document, to incorporate this comment.

**Comment:** 11. Site 10, §3.4, p. 16, ¶ 3, line 2; add “EPA” between the words “the” and “acceptable”.

**Response:** The text of the document has been modified, as shown on page 14 of the enclosed document, to incorporate this comment.

**Comment:** 12. Site 10, §3.4, p. 16, ¶ 4, line 3; add “EPA” between the words “the” and “acceptable”.

**Response:** The text of the document has been modified, as shown on page 15 of the enclosed document, to incorporate this comment.

**Comment:** 13. Site 10, §3.4, p. 18; add a summary statement, such as:

*Based on the human health and ecological risk assessments conducted for Site 10, the levels of contaminants in both the soils and groundwater do not pose an unacceptable risk to human health or the environment.*

**Response:** The text of the document has been modified, as shown on page 16 of the enclosed redlined document, to incorporate this comment.

**Comment:** 14. Site 10, §3.6, p. 19, top ¶; replace the word “invoked” with “triggered” in the last sentence.

**Response:** The text of the document has been modified, as shown on page 17 of the enclosed redlined document, to incorporate this comment.

**Comment:** 15. Site 10, §3.6, p. 19, top ¶; add a sentence to this paragraph that states:

*While no ARARs are invoked in the recommendation of a No Action decision for Site 10, all federal and state ARARs are preserved for potential future application with respect to the implementation of remedial action for other operable units at NCBC.*

**Response:** The text of the document has been modified, as shown on page 17 of the enclosed redlined document, to incorporate this comment.

**Comment:** 16. Site 10, §3.6, p. 19, ¶ 2; indicate the range of surface soil background concentrations for arsenic rather than just the max.

**Response:** The text of the document has been modified, as shown on page 17 of the enclosed redlined document, to incorporate this comment.

**Comment:** 17. Site 10, §3.6, p. 19, ¶ 4; change the first sentence to two sentences, such as:

*ARARS are not invoked in the development of this proposed NFA decision.  
However, since the State...*

**Response:** The text of the document has been modified, as shown on page 17 of the enclosed redlined document, to incorporate this comment.

**Comment:** 18. Site 10, §3.6, p. 20, ¶ 3; remove the "©" after "120".

**Response:** The text of the document has been modified, as shown on page 18 of the enclosed redlined document, to incorporate this comment.

**Comment:** 19. Site 10, Glossary, p. 22; Bedrock: remove the second sentence since all bedrock is fractured at some scale.

**Response:** The text of the document has been modified, as shown on page 20 of the enclosed redlined document, to incorporate this comment.

**Comment:** 20. Sites 06 & 11, §3.4.5, p. 19; the summary of ecological risks should be of the effects of the site on the watershed, not the whole watershed. Please delete the second and third bullets or describe the site habitat and the fact that there are no surface water bodies at the site. The Navy must provide a separate evaluation of the risks found in the watershed that are not attributable to the site.

**Response:** The text of the document has been modified, as shown on page 22 of the enclosed redlined document, to incorporate this comment.

**Comment:** 22. *Sites 06 & 11, §3.4.5, p. 20; the summary of ecological risks should be of the effects of the site on the watershed, not the whole watershed. Please delete the second and third bullets or describe the site habitat and the fact that there are no surface water bodies at the site. Delete the third bullet and replace with the fifth bullet from the site 06 ERA summary. The Navy must provide a separate evaluation of the risks found in the watershed that are not attributable to the site.*

**Response:** The text of the document has been modified, as shown on page 23 of the enclosed redlined document, to incorporate this comment.

**Comment:** 23. *Sites 06 & 11, §3.4.6, p. 20; if no PCB or pesticides were found in the soils at Site 06, please explain how there is a potential future risk from PCB or pesticides at Site 06?*

**Response:** Although no PCB/pesticides were detected in the soil samples collected during the Phase I and Phase II RI, the field investigation sampling performed for the TERA did result in the detection of PCB and pesticides. The constituents were detected in the Hall Creek Watershed, which includes Site 06, mainly in sediment samples. Although the presence of these constituents in the watershed was not directly attributed to Site 06, it is possible that Site 06 is a contributing factor to the presence of these constituents. The text of the document has been modified to state that a potential future ecological risk to avian receptors exists due to pesticide/PCB presence.

**Comment:** 24. *Site 06 & 11, §3.4, p. 20; add a summary statement, such as:*

*Based on the human health and ecological risk assessments conducted for Sites 06 & 11, the levels of contaminants in the soils do not pose an unacceptable risk to human health or the environment.*

**Response:** The text of the document has been modified, as shown on page 23 of the enclosed redlined document, to incorporate this comment.

**Comment:** 25. *Sites 06 & 11, §3.6, p. 21, first complete sentence on the page; since this Proposed Plan will be issued to the public only after the completion of the RI/FS process, replace the sentence with:*

*The NFA alternative is proposed for Site 06 and Site 11 soils. Additional groundwater studies are being conducted by the Navy for a separate groundwater operable unit with a Proposed Plan due to be issued in the early part of 1997.*

**Response:** The text of the document has been modified, as shown on page 24 of the enclosed redlined document, to incorporate this comment.

**Comment:** 26. Sites 06 & 11, §3.6, p. 21, last ¶ and p. 22 ¶ 3; change the first sentence to read:

*ARARS are not invoked in the development of this proposed NFA decision.  
However, since the State...*

**Response:** The text of the document has been modified, as shown on page 25 of the enclosed redlined document, to incorporate this comment.

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**RESPONSE TO RIDEM COMMENTS FOR DRAFT PROPOSED PLANS**  
**SITES 06, 11 & 10**

**Site 10:**

**Comment:** 1. Page 5, Section 2.6, Additional Public Information; RIDEM Listing. Please change Rhode Island DEM contact to:

*RI Department of Environmental Management  
Office of Waste Management  
235 Promenade Street  
Providence, RI 02908*

*Contact Person:  
Richard Gottlieb  
(401) 277-3872 x7138*

**Response:** The document has been modified to reflect the requested address changes, as shown on page 4.

**Comment:** 2. Page 17, Section 3.4.7, Evaluation of Potential Future Risk (Site 10 - Camp Fogarty Disposal Area), Paragraph 1, Sentence 3. Since the Navy is proposing a no further action for Site 10 it must therefore meet residential environmental criteria. Site 10 had four locations where lead was detected at concentrations above the lead-free level of 150 ppm ranging from 188 to 655 ppm and one location where the concentration was above the lead-safe level of 500 ppm as defined in Sections B.1.1 (a)(1) and B.2.4 (b)(2)(I) of the Rules and Regulations for Lead Poisoning Prevention [R 23-24.6-PB] of the Rhode Island Department of Health. This level would require a lead management plan. Sections B.1.5 (a)(5) and B.3.3 (c)(4) of the above mentioned regulations require a composite sample. The Navy did not take a composite sample, but rather obtained discrete samples. It may be possible to obtain a variance from the regulations whereby the discrete samples can be averaged to simulate a composite sample. RIDEM is requesting that the Navy apply

*for an application for a variance from the Rhode Island Rules and Regulations for Lead Poisoning Prevention [R 23-24.6-PB] Sections B.1.5 (a)(5) and B.3.3 (c)(4) relating to soil lead evaluation. Please note that the format used for Site 05 and 08 (dated 22 March 1995) should be used for Site 10. Please contact RIDEM prior to transmitting the variance request to the RI Department of Health.*

**Response:** The Navy has applied for a RIDOH variance for lead in surface soil at Site 10 as requested.

**Comment:** 3. Page 19, Section 3.6, *The Navy's Rationale for the NFA Preferred Alternative (Site 10 - Camp Fogarty Disposal Area); Paragraph 2, Sentence 4. Please note that RIDOH accepts discrete samples after a variance from the regulations has been obtained.*

*In addition, this paragraph notes that 35 soil samples were collected at Site 10 which had an average concentration of 90 mg/kg. Based on the Phase II RI Report, dated July 1994 eight surface soil samples were obtained during the Phase I investigation and 20 surface soil samples were obtained during the Phase II investigation. These 28 samples have an average lead concentration of 103 mg/kg. Please explain where the other seven samples came from.*

**Response:** As stated in the response to RIDEM Comment 3, the Navy has applied for a variance for Site 10. The total of 35 soil samples included surface soil and subsurface soil samples collected during the Phase I and Phase II RI. As per a telephone conversation between Rich Gottlieb of RIDEM and Linda Gardiner of Stone & Webster on 24 October 1996, only surface soil samples are included. Therefore, the text of the document has been modified to reflect only surface soil sample collection and analytical results, as shown on page 18.

**Comment:** 4. Page 20, Section 4, *For More Information; RIDEM Listing. Please change Rhode Island DEM contact to:*

*Richard Gottlieb  
RI Department of Environmental Management  
Office of Waste Management  
235 Promenade Street  
Providence, RI 02908  
(401) 277-3872 x7138*

**Response:** The document has been modified to reflect the requested address changes, as shown on page 19.

**Comment:** 5. *Glossary; "Lead-Safe" Definition. The definition notes lead-safe as containing anywhere from 150 to 1000 ppm of lead in the soil. Based on Section B.2.4(2) of the Rhode Island Department of Health Rules and Regulations for Lead Poisoning Prevention "lead-safe" is defined as containing anywhere from 150 to 500 ppm of lead in the soil. Please revise this definition.*

**Response:** The glossary definition of lead-safe has been modified accordingly to incorporate the comment, as shown on page 22.

**Sites 06 and 11:**

**Comment:** 1. *Page 5, Section 2.6, Additional Public Information; RIDEM Listing. Please change Rhode Island DEM contact to:*

*RI Department of Environmental Management  
Office of Waste Management  
235 Promenade Street  
Providence, RI 02908*

*Contact Person:  
Richard Gottlieb  
(401) 277-3872 x7138*

**Response:** The document has been modified to reflect the requested address changes, as shown on page 6.

**Comment:** 2. *Page 13, Section 3.4.2, Nature and Extent of Constituents of Concern (COC); Site 06, Inorganic Analytes (Surface Soils), Paragraph 3, Last Sentence. This sentence implies that a soil is considered lead-free if a lead management plan is implemented. This sentence should be removed since a lead management plan would only be implemented if the soil were not considered lead-free.*

**Response:** The above referenced sentence has been removed from the document, as shown on page 15.

**Comment:** 3. *Pages 21 & 22, Section 3.6, The Navy's Rationale for the NFA Preferred Alternative; Site 06, Paragraph 2, Last Sentence Pg 21, First Sentence Pg 22. This sentence implies that a soil is considered lead-free if a lead management plan is implemented. This sentence should be removed since a lead management plan would only be implemented if the soil were not considered lead-free.*

**Response:** The above referenced sentence has been removed from the document, as shown on page 25.

**Comment:** 4. *Page 23, Section 4, For More Information; RIDEM Listing. Please change Rhode Island DEM contact to:*

*Richard Gottlieb  
RI Department of Environmental Management  
Office of Waste Management  
235 Promenade Street  
Providence, RI 02908  
(401) 277-3872 x7138*

**Response:** The document has been modified to reflect the requested address changes, as shown on page 27.

**Comment:** 5. *Figure 1, Site Locus Map. Please revise Figure to only highlight Sites 06 and 11. It might also be helpful for the general public if the NCBC boundaries are also highlighted.*

**Response:** The Site Locus Map has been modified as requested, as shown in Figure 1.

**Comment:** 6. *General Comment. Since the Navy is proposing a no further action for Site 06 it must therefore meet residential environmental criteria. Site 06 had one location where lead was detected at a concentration of 616 ppm which is above lead-safe criteria as defined in Sections B.1.1 (a)(1) and B.2.4 (b)(2)(I) of the Rules and Regulations for Lead Poisoning Prevention [R 23-24.6-PB] of the Rhode Island Department of Health. This level would require a lead management plan. Sections B.1.5 (a)(5) and B.3.3 (c)(4) of the above mentioned regulations require a composite sample. The Navy did not take a composite sample, but rather obtained discrete samples. It may be possible to obtain a variance from the regulations whereby the discrete samples can be averaged to simulate a composite sample. As the Navy has noted, the average of the samples for Site 06 would be 93.36 ppm which is below the lead-free criteria and a lead management plan would therefore not be required. RIDEM is requesting that the Navy apply for an application for a variance from the Rhode Island Rules and Regulations for Lead Poisoning Prevention [R 23-24.6-PB] Sections B.1.5 (a)(5) and B.3.3 (c)(4) relating to soil lead evaluation. Please note that the format used for Site 05 and 08 (dated 22 March 1995) should be used for Site 06. Please contact RIDEM prior to transmitting the variance request to the RI Department of Health.*

*Site 11 did not exceed the lead-free criteria for any samples obtained therefore a variance is not required for this site.*

**Response:** The Navy has applied for a RIDOH variance for lead in surface soil at Site 06 as requested.