



DEPARTMENT OF THE NAVY

NORTHERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
10 INDUSTRIAL HIGHWAY
MAIL STOP, #82
LESTER, PA 19113-2090

N62578.AR.000714
NCBC DAVISVILLE
5090.3a

IN REPLY REFER TO

1823/PO
7 October 1996

Ms. Christine A.P. Williams
U.S. Environmental Protection Agency
Region 1
J.F Kennedy Building HBT
Boston, MA 02203-2211

Mr. Richard Gottlieb
Office of Waste Management
Rhode Island Department of Environmental Management
235 Promenade Street
Providence, RI 02908-5767

Re: ECOLOGICAL RISK ASSESSMENT ISSUES AND PROPOSED PLANS for SITES 6,
10,& 11 at the NAVAL CONSTRUCTION BATTALION CENTER (NCBC) DAVISVILLE, RI

Dear Ms. Williams and Mr. Gottlieb,

The Navy has received the Environmental Protection Agency's (EPA) and United States Fish and Wildlife Service's (USF&WS) 19 September 1996 comments on the Site 11 demonstration of the application of ecological risk-based information for remedial decision making. The Rhode Island Department of Environmental Management's (RIDEM) comments were received on August 21. The National Oceanic and Atmospheric Administration's (NOAA) comments were received on October 3.

EPA concurred with the conclusion that contaminant levels detected in the Site 11 soils do not pose a threat to the ecological receptors evaluated, not necessarily due to the demonstration presented, but because of the overall weight of evidence presented in the Ecological Risk Assessment (ERA). Please note that the Navy developed the demonstration to address EPA comments on the ERA, in particular comments on the weight of evidence approach presented in the document. EPA's letter indicated that a re-evaluation of the ERA is being conducted to determine if outstanding issues noted in the various review letters could be implemented to provide a more realistic assessment.

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RIDEM, USF&WS and NOAA comments focused more on the process used in the demonstration and did not comment on the proposed no action for the site. NOAA indicated that the approach is valid and could be useful in making remedial decisions based on ERA results, assuming that the risk assessment is defensible. USF&WS commented that the process has the potential for providing a simplified presentation of site-specific soil risks, which may be useful for risk management, again assuming that the ERA is complete.

The Navy requests direction on how to proceed with the development of ERA information for the Preliminary Remedial Action Plan's for Sites 6 and 10. EPA commented that the demonstration was useful for Site 11 yet would not endorse this as a codified process across Navy sites. With that noted, we feel that the demonstration would again be useful to support a no action PRAP for Sites 6 and 10. However, the Navy feels that once again the weight of evidence presented in the ERA may be sufficient.

The Navy requests a copy of the most recent EPA Region I guidance for incorporating and presenting weight of evidence into the risk characterization section in order to have a codified process to be applied across sites at NCBC Davisville and within the Region. We will be forwarding a separate letter on this issue, as there has been little to no consistency on this topic at our sites in the Region.

In a related manner, the Navy concurs with the EPA's recommendation to combine the public meetings and the PRAPs for Site 11 and Sites 6 and 10 into one meeting. If there are any questions on this matter, I can be reached at (610) 595-0567 ext 155.

Sincerely,



P. S. OTIS, P.E.

Remedial Project Manager

by direction of the Commanding Officer

Copy to:
RIEDC - H. Cohen
TONK - S. Licardi
CSO Davisville, RI

Internal copies:

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EA - J. Shultz

EA - D. Mayhew