



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-831-5508

8 August 1997

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 Human Health Risk Assessments (HHRA)
Sites 06,08, and 11 Ground Water
and Site 13 Soil and Ground Water
NCBC Davisville, Rhode Island
Submitted 3 July 1997, Dated June 1997

Dear Mr. Otis;

The Rhode Island Department of Environmental Management, Office of Waste Management has reviewed the above referenced document and comments are attached.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard Gottlieb', is written over a large, stylized flourish or scribble.

Richard Gottlieb, P.E.
Principal Sanitary Engineer

Attachment:

cc: W. Angell, DEM OWM
C. Williams, EPA Region 1
H. Cohen, RIEDC
M. Cohen, ToNK
W. Davis, CSO NCBC
J. Shultz, EA Eng.

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Comments For:

**Draft Human Health Risk Assessments (HHRA):
Sites 06, 08, and 11 Ground Water
and Site 13 Soil and Ground Water
NCBC, Davisville, Rhode Island**

Submitted 3 July 1997, Dated June 1997

1. **Page 1, Section 1.0 Introduction;
Paragraph 2, Sentence 2.**

Risks associated with soil media for Sites 06 and 11 were previously addressed...

Please note that soils for Site 08 have also been addressed.

2. **Page 58, Section 1.6.2.1, Site 06;
Whole Section.**

This section deals with lead in groundwater at Site 06 and notes that one of the three wells exceeds the EPA Action Level (AL) for lead in groundwater, though the average concentration of the three wells is below the AL. The analysis then concludes that risk is not anticipated from groundwater ingestion. This is not acceptable as a risk analysis. please provide the appropriate analysis.

3. **Page 65, Section 1.6.2.3.1, Site 13 Risks Associated with Lead;
Paragraph 2, Last Sentence.**

please state if the Navy is going to prepare an Environmental Lead Management Plan.

4. **General Comment.**

The risk analysis shows that Sites 11 and 13 pose risk for the Future Adult and Children scenarios. Please state if the Navy will propose restrictions preventing the residential use of these properties.