



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-831-5508

19 December 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: Navy Response to RIDEM Comments Dated 8 August 1997
Draft Human health Risk Assessment
Sites 06, 08, & 11 Groundwater and
Site 13 Soil & Groundwater
NCBC Davisville, Rhode Island
Submitted 9 December 1997, Dated December 1997

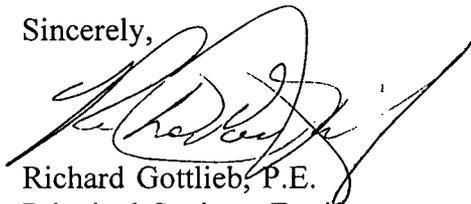
Dear Mr. Otis;

The Rhode Island Department of Environmental Management, Office of Waste Management (RIDEM) has reviewed the above referenced document. Please note that the first comment attributed to RIDEM (*Page 11-2, Site 11 Evaluation, Step 1*) is not a RIDEM comment.

RIDEM Comment 4 noted that future adult and children residential scenarios showed risk at Sites 11 and 13 and therefore residential restrictions should be placed on the property. The Navy only responded to Site 11 indicating a response to Site 13 would come at a later date. The Navy states that the method detection limit for antimony (COPC) was 35 ppb, which in and of itself is associated with a hazard quotient of 2 for adults and 7 for children. The Navy further states that antimony is determined to be a risk driver due to a common problem of a laboratory method's inability to detect a chemical below the risk-based screening criteria (i.e., 15 ppb for antimony). Mitkem Laboratories of Warwick, Rhode Island can detect antimony in groundwater to a concentration as low as 5 ppb, which is below the risk-based screening criteria. RIDEM would suggest that either the Navy retest the groundwater, with a lower detection limit, to better evaluate risks or in lieu of this and to be on the conservative side of protecting human health place residential deed restrictions on the property. It should be noted the residential deed restrictions would not conflict with the proposed industrial/commercial reuse scenario detailed in the Base Reuse Plan.

With the exception of the two comments noted above all other responses are acceptable. 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', written over a horizontal line.

Richard Gottlieb, P.E.
Principal Sanitary Engineer

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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