



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203-0001

March 10, 1998

Mr. Philip Otis
U.S. DoN
Northern Division - NAVFAC
10 Industrial Highway
Code 1811/PO - Mail Stop 82
Lester, PA 19113-2090

Re: Review of Navy Response to EPA Comments on the Human Health Risk Assessment (HHRA): Sites 06, 08 and 11 Groundwater and Site 13 Soil and Groundwater, dated March 3, 1998, at the former Naval Construction Battalion Center (NCBC) - Davisville, Rhode Island

Dear Mr. Otis:

Pursuant to § 7.6 of the NCBC Federal Facility Agreement (FFA), the Environmental Protection Agency (EPA) has reviewed the above referenced document.

EPA comment number 3 highlighted the Region 1 standard practice of using maximum site values for groundwater risk assessment. The Navy's response was to present the difference in risk estimates between 95UCLM and maximum detect concentrations in the text. This response is sufficient for these no action sites. However, please be advised that in the revised risk assessment for sites 1, 2, 3 & 4, EPA expects the Navy to use the maximum detect concentration as the exposure point concentration in groundwater for all RME groundwater ingestion exposure scenarios. This RME value must also be included in summary tables not just in the text. If the Navy would prefer to also include the risk estimate using the 95UCLM as exposure point concentration, it may also be noted on the risk tables and in the text.

EPA had requested redlined change pages be included with these responses, however, this was not done. Please provide an electronic version of the redlined text changes for our review along with the final document. This procedure has worked well in the review of the proposed plans.

If you have any other questions with regard to this letter, please contact me at (617) 573-5736.

Sincerely,

A handwritten signature in cursive script, appearing to read "Christine A.P. Williams".

Christine A.P. Williams
Remedial Project Manager
Federal Facilities Superfund Section

cc: Richard Gottlieb, RIDEM
Cintha Hanna, EPA
Walter Davis, CSO
Bryan Wolfenden, RI RC&D Council Inc.
Howard Cohen, RIEDC
Susan Licardi, ToNK
Eileen Curry, Dynamac
Jane Connet, EA
Linda Gardiner, Stone & Webster Eng.