



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

Department of Environmental Management
DIVISION OF SITE REMEDIATION
291 Promenade Street
Providence, R.I. 02908-5767

28 December 1993

Marilyn Powers, Remedial Project Manager
U.S. Department of the Navy
NAVFACENGCOM-Northern Division
Code 1823, Mailstop #82
10 Industrial Highway
Lester, PA 19913-2090

RE: Draft Study Area Screening Evaluations for:
CED Drum Storage Area, CED Asphalt Disposal Area,
Calf Pasture Point Munitions Bunkers and the NCBC Building 56 at
Naval Construction Battalion Center, Davisville.

Dear Marilyn:

This Division has received and reviewed the documents listed above and has provided the attached preliminary comments for your review. The Division is also in receipt of the 17 December 1993 facsimile and the HNUS deviations from the work plan. The Division requests a written explanation and complete assessment of the impact of these deviations on the work completed to date.

In general these documents have included risk evaluations which were not called for in the SASE Work Plan. The objective of these investigations as stated in the Work Plan, was to assess the presence and nature of environmental contamination within the four study areas. Through review of these documents, the Division has determined that enough data was not generated during these studies to properly assess risk. Additionally, the Division is concerned that some of the information provided in these SASE documents conflict with information contained in the Phase II Remedial Investigation report currently undergoing review. Given that the contractor does not have ample data to evaluate risks to human health and groundwater conditions, the Navy should insure that statements concerning these topics are removed from the SASE documents. Also, the contractor does not come to clear conclusions as to whether any additional investigation work is warranted at these sites prior to regulatory concurrence of "No Further Action" and/or interim property use and transfer.

The Division requests written response to these preliminary comments at the Navy's earliest convenience. If you have any questions please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "W.S. Angell II (for)". The signature is written in a cursive style.

Judith S. Graham
Engineer

cc: W. Angell, RIDEM/DSR
J. Crawford, RIDEM/DSR
R. Gottlieb, RIDEM/DSR
M. Daly, USEPA Region 1

enclosure
SASE.1/jg

**CED Drum Storage Area
Study Area Screening Evaluation
October 1993**

Comments

1. Page 1-1, Introduction 1.0, paragraph 2

Please correct paragraph two. The objective of this investigation was to determine the presence of contamination from past activities. Also, approved background sampling locations and analysis results for comparison to site data should be referenced in the text and tables of the document.

2. Page 2-4, paragraph 3

Please explain the status and location of the rifle range mentioned in the text and indicate whether the back stop area has been investigated as a potential source area for lead contamination.

3. Page 3.2, 3.1.2 Geophysical Survey

Please explain the Navy's intentions to further address the 2 anomalies identified in the report.

4. Page 3-3, 3.1.3 Soil Gas survey, paragraph 1

The purpose of the soil gas survey was not to assess the presence of buried drums of waste oil on site but rather to determine if release have occurred on site as a result of past activities, i.e. drum storage.

5. Page 3-3, 3.1.3 Soil Gas Survey, Paragraph 5

Please identify the Navy's intentions to address the geophysical anomaly and associated methane detected during the soil gas survey in the Northwest portion of the site.

6. Page 3-4, 3.1.4 Soil Sampling, results, paragraph 1

Please identify the nineteen SVOCs detected and whether any are polycyclic aromatics.

7. Page 3-4, 3.1.4, paragraph 3

PCBs in soil are regulated under State regulations. The current policy is to cleanup soil levels to 10 ppm.

8. Page 3-4, Ground Water

Concentrations of volatile organic and inorganic compounds in the groundwater at or exceeding the MCL may present a future reuse concern. Although the groundwater classification is GB (unsuitable to drink without treatment) the Navy may need to place deed restrictions on the property to insure that groundwater is not used. Additionally, continued degradation of the groundwater by contaminants in the soil may warrant a treatment action.

9. Page 3-4, 3.1.6 Catch Basin Sample Results

The catch basin system and out fall points should be clearly marked on site maps. If results are for an aqueous sample, the results should be compared to the appropriate ambient water quality standards for Rhode Island.

10. Page 3-6 and 3-7, Table 2-1, 3-2

Please explain why the maximum soil sample concentrations were not compared to site background data.

11. Page 3-9, Table 3-4

Please clarify in the text as to whether the catch basin sampling results are water or sediment. Also, as stated in comment #9, results should be compared to ambient water quality standards or background soil concentrations.

12. Page 4-3, 4.2 Hydrogeology

The text states that groundwater movement is from the west toward the east, while the site map (Figure 2-3) depicts a north/north-easterly groundwater movement. Please clarify.

13. Page 4-3, Water supply information, paragraph 2, last sentence

The SASE document concerning the Calf Pasture Point Munitions bunkers indicated that this private well was 0.5 mi. from Calf Pasture Point. Please clarify the well distance to this site.

14. Page 5-1, 5.0 Risk Evaluation-Surface Water, paragraph 4

Shellfishing in Allen Harbor has been closed since approximately 1986 due to the detection of contaminants in the sediment near the landfill. Additionally, the "minimal" risk conclusion is inadequate given the

numerous constituents detected in the catch basin samples.

15. Page 6-1, Risk Evaluation, Soil Exposure, paragraph 3

a) Concentrations of contaminants detected in the soil should be compared to the approved NCBC background data. Risks related to the levels of contaminants in the soil may dictate reuse restrictions at the site.

b) Please explain how the contractor can draw the conclusion that " Low concentrations of pesticides, metals and VOCs pose no significant risk in a residential scenario" given that no risk evaluation data is presented or tasked in this sampling effort.

16. Page 7-1, Risk Evaluation, Air

No air monitoring data was generated during this study. The Division does not accept conclusions concerning risks in the absence of data.

17. Page 8-1, 8.0 Summary, Conclusions and Recommendations

As previously stated the objective of this investigation was to determine the presence of contamination from past activities. Please make objective statements consistent.

18. Page 8-2, paragraph 3

If no information regarding the private wells is available, how then does NUS know that the wells are located at higher elevations than CED Drum Storage area? The report should explain this conclusion.

19. Page 8-2, General Comment

The conclusions drawn by NUS as part of this investigation may support no further action for property remaining as a Government installation, however, risks to human health and the environment must be evaluated at a minimum for the intended reuse option.

20. Appendices, General Comment

Please define each qualifier used in the data sets and insert.

21. Appendix A, General Comment

a) Please explain why analytical data is not compared to approved

background concentrations or regulatory standards which are available.

b) Please explain why catch basin samples (water or sediment) are not compared to their appropriate standards.

**CED Asphalt Disposal Area
Study Area Screening Evaluation
November 1993**

Comments

22. Page 2-1, Figure 2-3

Please explain where the location of the practice loading ramp is, mentioned in the text and on figure 2-3.

23. Page 2-3, Figure 2-2

As requested in comment #1 , please explain where the HNUS background soil data was taken which is identified in the figure.

24. Page 3-2

Please explain why the hazardous waste characterization for the fourth character, Toxicity (TCLP), of the Asphaltic Material was not conducted. The contractor should have analyzed the material for all of the toxic compounds identified in regulations. Also, because PCB's were detected throughout the soil sampling areas, the Asphaltic Material should be analyzed for PCB content.

25. Page 3-3 Geophysics Survey

Please identify the Navy's intentions to address the unknown area detected by the GPR.

26. Page 3-7, Validated TCLP Data

See Comment #3

27. Page 3-10

As stated above, please discuss the suspected origin of the PCB concentration hits.

28. Page 4-1

Please explain how the contractor can discuss ground water risk when no ground water data was collected.

29. Page 4-3, paragraph 2

Previous SASE documents state that a private drinking well is located 0.5 mi. at the intersection of Fletcher Rd. and Candlewood Dr. Please clarify this in the text.

30. Page 4-3

There is no ground water information in this report from which a conclusion on groundwater risk at this site could be based. Please correct the statement.

31. Page 5-1, Risk Evaluation, Surface Water, paragraph 3

Please correct the Allen Harbor statement. The harbor was closed to shellfishing in approximately 1986 due to sediment contamination near the landfill.

32. Page 6-1, paragraph 4

The paragraph is incorrect. The lack of TCLP data and PCB content of the Asphaltic Material cannot allow the contractor to conclude that " no compounds detected at the site exceed regulatory cleanup criteria".

33. Page 8-1, 8.0 Summary, Conclusions and Recommendations

- a. Conclusions concerning on groundwater risk cannot be drawn due to lack of data.
- b. Asphaltic Material was not properly characterized.
- c. No background sampling was conducted.
- d. If the material allegedly presents no problem, then please explain why the contractor is proposing offsite disposal.

This section should be revised accordingly.

34. Appendix C

- a. Please explain why tetrachloroethane was not mentioned in the text section TCL Volatiles in surface soils. From a review of the data, Tetrachloroethane was detected in all of the surface soil samples.

b. Please explain what the source of contaminants in the west end of the trench is since the asphalt is at the east end.

c. Qualifiers in the data tables need to be explained.

35. Appendix D, Soil Boring B4-S1

Please explain "result taken from dilution analysis" and whether the contractor believes the concentrations are far greater.

36. Appendix D

a. The TCLP analysis presented should be compared to the TCLP standards.

b. Please explain when the validated results are going to be available.

c. Again, in order to complete an accurate profile of the asphaltic material, TCLP analysis for metals, VOCs, SVOCs and Pesticide/Herbicides should be conducted. Also, PCBs should be conducted as part of the pesticide analysis.

**Calf Pasture Point Munitions Bunkers
Study Area Screening Evaluation
October 1993**

Comments

37. Page 3.5, 3.3.1 Geophysical Survey

Please explain the Navy's intentions for investigating the 4 anomalies detected.

38. Page 3-6, General Comment

Please describe the material found in the upper layers of the test pits above the naturally deposited soils. A review of pre-1940 aerial photos, indicates that a large portion of Calf Pasture Point was formed by the placement of dredge material. Is dredge material being considered fill in this case? Again, please explain.

39. Page 3-6 , General Comment

Please explain why soil samples were taken at opposite ends of the trenches and at different depths. The sampling effort was to collect

representative samples of the excavation area.

40. Page 4-2, Hydrogeology 4.3

Please clarify ground water movement at Calf Pasture Point. Previous studies and Page 4-3 (paragraph 2) of this study indicate movement is to the south and east.

41 Page 4-2, Hydrogeology 4.3, last sentence

Please clarify this statement. Waste materials were and still are disposed of on the site.

42. Page 4-3, paragraph 4

The contractor should review the groundwater investigation conducted as part of the Phase I and Phase II Remedial Investigations.

43. Page 4-4

For clarity in this report, identify in the text and on a site map the location of all investigation areas and disposal areas at Calf Pasture Point.

44. Page 5-1, 5.0 Risk Evaluation, Surface Water, paragraph 3

Shellfishing was closed in Allen Harbor in approximately 1986 due to sediment contamination near the Allen Harbor landfill. Please correct.

45. Page 6-1

Although restrictions exist currently at NCBC, there may not be site restrictions in the future when the land transfers over for reuse purposes. If conditions warrant access restrictions, it should be inserted into the Calf Pasture Point Record of Decision (ROD).

46. Page 8.1, 8.0 Summary and Conclusions

Again, potential risks cannot be assessed due to lack of data. Please revise accordingly based upon all comments received from agencies.

47. Appendix B

a) Analytical data for soils and ground water need to be compared to the appropriate background levels and/or standards which are applicable. Please correct.

b) Please explain the qualifiers used.

**NCBC Building 56
Study Area Screening Evaluation
November 1993**

Comments

49. Please explain why the drain sample was taken 190 feet away from the building and whether the contaminants detected are considered dilutions of higher levels at the site.
50. Page 3-3 and Tables 3-2,3-3
- Results from the drain samples should be compared to the allowable surface water discharge standards or allowable POTW standards.
51. Page 4-2, Soil Borings
- Please explain how soil borings were closed.
52. Page 4-3, last sentence
- Please remove the last sentence. There is no ground water information presented to support this conclusion.
53. Page 5-1, General Comment
- Please correct the Allen Harbor information. Shellfishing has been closed since 1986 due to sediment contamination near the landfill.
54. Page 5-1, General Comment
- Please explain how the contractor can conclude on surface water impact when no specific surface water body is compared to in the text.
55. Page 6-1, 6.0 Risk Evaluation, Soil Exposure, paragraph 2
- Please explain how the contractor can draw the conclusion that if the pavement were removed from the site, "no significant risk would result in a residential scenario from exposure to soil." There has been no risk assessment data generated for review.
56. Page 7-1, General Comment

The report states that no VOC's were detected. Please explain then the 1ug/kg tetrachloroethane hit.

57. Page 8-1

Please explain if the concrete pad warrants removal and disposal as part of base reuse. If so, sampling beneath the pad area may be necessary to determine if any contamination from past activities at the structure are in the underlying soils.

58. Page 8-1

Please explain the concentration of the elevated lead on the exterior and interior of the building. Is the concentration associated with paint materials. Please explain.

59. Page 8-1

Again, as previously stated, how can the contractor conclude that no risk are present when no risk assessment has been conducted.

60. Appendix A

Please insert an explanation of the qualifiers used in the data sets.