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Navy Response to EPA Comments on the Draft Proposed Plan Site 07 - Calf Pasture Point Naval Construction Battalion Center Davisville, Rhode Island

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Navy Responses to EPA Comments on the Draft Proposed Plan for Calf Pasture Point (Site 07) NCBC Davisville, Rhode Island

The following responses are to EPA's comments (dated 13 June 1997) on the Draft Proposed Plan (dated April 1997) for Calf Pasture Point (Site 07) at the former Naval Construction Battalion Center, Davisville, Rhode Island.

Comment 1. Page 1, column 1, last sentence. Insert a reference to the shaded box for clarity, such as: "This Proposed Pan summarizes the Navy's preferred alternative of **Institutional Controls** (see shaded box) for the Site 7 remedy."

Response: The text has been added.

Comment 2. Add an index or table of contents box on the front page (lower right).

Response: A table of contents has been added.

Comment 3. Page 1, top of column 2. The PP should address concerns of the use of groundwater and the migration to surface water. Change the sentence to read, "This Proposed Plan addresses concerns that the conditions at Site 07 pose an unacceptable risk to human health based on the potential for future ingestion or use of affected ground water and the potential for future risk to human health and the environment from the migration of contaminated ground water to surface water."

Response: Text has been added which states that the Proposed Plan also addresses concerns about the potential future risks of ground-water discharging to surface water. However, it is also noted that the HHRA, Marine ERA, and the Freshwater/Terrestrial ERA have not identified unacceptable risks for surface water based on existing conditions. The migration of ground water to surface water was not identified as an unacceptable risk for future human health in these reports. The Navy acknowledges that migration to surface water is of concern to the BCT and that additional sampling is presently warranted in the interior wetlands. The Navy has agreed to include seep samples from the shoreline and sediment/surface water samples from the interior wetlands as part of the monitoring program until such a time when the BCT is confident that these media will continue to pose no unacceptable risk to human health and the environment.

Comment 4. Page 1, column 2, shaded box. The PP summary should also include surface water and sediment sampling and annual meetings to update the public on the results of the monitoring program.

Response: The intention of the shaded box is to provide a brief, reader-friendly summary of the scope of the Navy's preferred remedial alternative. Details about the components listed therein are presented in the section following the shaded box (entitled "The Cleanup Proposal").

Surface water and sediment sampling within the interior wetlands has been added to that supporting text (see response to comment 3). The second bullet within the shaded box has been changed to "long-term monitoring" in deference to this additional sampling.

The Navy intends to employ previously-established mechanisms to communicate information to the public as outlined in the NCBC Community Relations Plan (e.g., RAB meetings, Fact Sheets, public notices, etc.) rather than annual meetings as suggested in the comment.

Comment 5. Page 1, column 2, shaded box. Change the bullet "5-year reviews" to "Navy, EPA & RIDEM 5-year reviews" to assure the public that the BCT will continue to evaluate the performance of the remedy and not leave this evaluation to the ToNK.

Response: The text has been changed accordingly.

Comment 6. Page 1, column 2, second bullet. Remove the words "semi-annual" and the words within the parenthesis. The bullet should state, "Monitoring of selected upgradient, downgradient, and side-gradient ground-water monitoring wells and sediments and surface water at the ground water discharge points to monitor the extent of the ground water plume over time; and"

Response: The text has been revised to read: "Long-term monitoring of the ground-water plume (as well as sampling of shoreline seeps and sediment/surface water from interior wetlands, as warranted) to ensure that the site continues to pose no unacceptable risks to human health and the environment...".

Comment 7. Page 2, column 1. Add a bullet. "Annual meetings to update the public on the results of the LTMP."

Response: The Navy intends to employ previously-established mechanisms to communicate information to the public as outlined in the NCBC Community Relations Plan (e.g., RAB meetings, Fact Sheets, public notices, etc.) rather than annual meetings as suggested in the comment.

Comment 8. In box on documents are available for review change to **Where *you* can go to review documents...**

Response: The text has been changed accordingly.

Comment 9. Page 3, Column 1. Under site history, page 3 last paragraph first column, insert "as shown in" (**as shown in** figure 1)

Response: The text has been changed accordingly.

Comment 10. Page 3, column 2. Boldface significant dates on time line **between 1960 and 1974**, also do separate bullet for 1978 and 1982

Response: The dates have been put into boldface. A separate (fourth) bullet was not used because the three bullets are intended to describe the three distinct disposal incidents, as stated in the introductory sentence preceding the first bullet (i.e., the bullets outline the past disposal activities at Site 07 and not a time line of the overall site history).

Comment 11. Page 3, column 2. Put comma after thirty to forty, 35-gallon...

Response: A comma has been added.

Comment 12. Page 4, top of column 1. The Navy has stated previously that there have been no records discovered of exacting the size or the type of containers disposed of at the site. Change the sentence to read, "At some time between 1968 and 1974, a trench measuring approximately 10 ft x 20ft x 15 ft was purportedly filed with approximately the equivalent of 2500 3-gal cans which contained "Decontaminating Agent Non-Corrosive"(DANC) solution."

Response: The text has been changed accordingly.

Comment 13. Page 5, column 2. Results of field investigation, Geology- consider replacing text with a cross section graphic

Response: Figure 3 contains a typical cross-section of the Site 07 stratigraphy. Due to the complex geology at Site 07, the accompanying text is warranted to clarify what is shown in the figure.

Comment 14. Same cross section could be used to describe hydrology zones. Diagrams referred to as figure 4-6 too hard for the general public to read.

Response: Due to the complex geology and hydrology at Site 07, a single cross-section could not accurately depict the conditions beneath the site. Figure 3, which contains a typical geologic cross-section, has been referenced while discussing the hydrologic zones. Figures 4 through 6 are necessary to show the variations in the ground-water flow regime in the different hydrologic layers.

Comment 15. Pages 6-13. Rather than the wordy text on these pages, the Navy should put together several tables. As a reader this is the most important bit of info you can give me (process and method are secondary).

The first should be similar to the following:

RESULTS OF INVESTIGATIONS

	Chlorinated VOC	SVOC/Pest/ PCB	Metals and Salts
Groundwater	√		√
Soils	trace		trace
Sediments		√	√
Surface water			√
Shellfish Tissue		√	√

with a note that the results of the sediment/surface water/shellfish tissue investigations indicated that the SVOC/Pest/PCB results are from other Navy/public sources within the Allen Harbor. Spell out VOC & SVOC & PCB

The second table should be similar to the following:

RISKS to HUMAN HEALTH

Exposure Scenarios Evaluated	ground water ingestion	inhalation of VOC during showering	dermal contact with ground water during showering	incidental ingestion of sediments or soils	dermal contact with sediments or soils	shell fish ingestion
residential populations	√					
recreational populations		√	√			√
future construction/ remediation worker populations						

√ = unacceptable cancer risks (above 1 in 10,000) and unacceptable non-cancer risks (above threshold value of 1)

with a note that the site source related risks are due to the use of groundwater and that the risks from eating shell fish are due to other Navy/public sources in the Allen Harbor.

The third table should be similar to the following:

ECOLOGICAL RISKS

	Chlorinated VOCs	SVOC/Pest/PCBs	Metals
terrestrial receptors		√	√
marine receptors		√	√

with a note that there are no site source related risks to the ecological receptors and the existing risks are due to other Navy/public sources in the Allen Harbor.

The fourth table would be similar to the following:

COMPARISON OF ALTERNATIVES

	No Action	Institutional Controls	Anaerobic Bio-degradation	Re-circulating Wells	Permeable Reaction Wall
Protection of Human Health		✔	✔	✔	✔
Compliance with ARARs					
Long-Term Effectiveness and Permanence		✓	✓	✓	✓
Reduction of Toxicity, Mobility or Volume through Treatment			✓	✓	✓
Short-Term Effectiveness		✔	✔	✔	✔
Implement-ability	✔	✔	✔	✔	✔
Cost		93,000+(30x 23,800)= $807,000	$2,266,000	$3,492,000	$7,837,000

Support Agency Concurrence		✔			
Community Concurrence*					

* to be solicited during the public comment period
✓ = partially meet criteria
✔ = meet criteria

With the note that the none of the alternatives will comply with ARARs because none will remediate site ground water below regulatory standards.

Response: Tables summarizing the results of the Site 07 investigations have been added. Much of the text has been retained to provide additional information and clarifications for the readers.

Comment 16. The text which describes the various alternatives should be kept, pp10-12, as should the Rationale for the Proposed Remedial Alternative section with the previously noted changes to the monitoring program (include sediment and surface water and remove "semi-annual") and the annual public meetings.

Response: The text pertaining to descriptions of the remedial alternatives and the rationale for the proposed remedial alternative have been retained. The monitoring program descriptions have been modified accordingly (see response to comments 4 and 6). See response to comment 7 regarding annual public meetings.

Comment 17. Page 14, column 2. Under important dates. Insert: **refer to page 2 for details** under dates

Response: The text has been added.

Comment 18. On top of figure clarify what reader is looking at. Identify clearly what figure is of. Calf Pasture point should be labeled on all figures.

Response: The figures have been modified to improve clarity.

Comment 19. Please **SHADE** zone 7 in figure 1 for clarity to the reader.

Response: Site 07 (in Zone 3) has been shaded.