UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203-0001

July 31, 1997

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

Re: Response to Comments for the Remedial Investigation Report
Site 7 Calf Pasture Point
Former Naval Construction Battalion Center, Davisville, RI

Dear Mr. Otis:

The Environmental Protection Agency, Region I (EPA) has reviewed the above captioned document, dated July 18 pursuant to § 7.6 of the NCBC Federal Facility Agreement (FFA).

The Navy presented another Conceptual Long Term Monitoring Plan (CLTMP) at meeting on July 22, 1997 that should address many of our ongoing concerns with this site. The RTC for the RI uses the CLTMP as the answer to many of our comments. EPA agrees that the use of site specific data gathered during the CLTMP, with modification, will provide the flexibility to address most of our concerns with the stability of the plume. EPA expects to provide the Navy comments on the CLTMP by August 22, 1997.

The Navy has also agreed to remove all references to the SUTRA and AT123D modeling in the RI/FS. This will enable the Navy to rely on site specific data to support the conclusions of the RI.

In our letters dated June 13, 1997 concerning the draft PP and dated July 1, 1997 concerning the Interim RTC for the RI/FS for this site, EPA stated that the administrative record for the OU will not be complete until the Navy submits a final RI/FS. We requested a schedule as to when the revised RI/FS will be submitted, but have not yet received it. Additionally, the Redlined Proposed Plan (PP), dated 2 July, indicated the PP would be issued on August 1, 1997 and an informational meeting would be held on the 13 of August with a hearing on the 20th of August. Please provide a schedule for this site.

Please be advised that the RI/FS for this OU will not be considered complete until the Navy submits RI/FS documents which are satisfactory to EPA. The complete administrative record for this OU must be available for public review and comment at the time the PP is issued. Therefore, EPA does not approve the issuance of the PP on August 1, 1997.

If you have any questions, or would like to set up a meeting, please contact me (617) 573-5736.

Sincerely,

Christine A.P. Williams, RPM
Federal Facilities Superfund Section

Enclosure

cc: Richard Gottlieb, RIDEM
Bill Brandon, EPA
Jayne Michaud, EPA
Forest Lyford, USGS
Tim Prior, USFWS
Walter Davis, NCBC
Marjory Myers, Narragansett Tribe
Marilyn Cohen, ToNK
Howard Cohen, RIEDC
Bryan Wolfenden, RI RC&DC, Inc.
George Horvat, Dynamac
Jim Shultz, EA

EPA Responses to Navy's July 18, 1997 Comments on the DF RI for Site 7

The Navy's responses were adequate with the exception of those comments noted below.

EPA GENERAL COMMENTS - ENCLOSURE 1

Comment 1B and Comments 2, 3, 11, 70, 109, 120, 127, 128, and 144A. As a result of conceptual problems identified during previous reviews of the RI with respect to the AT123D model simulation, EPA suggested that "the RI be amended to state that the model results will not be used to make decisions about fate and transport into the harbor, but that site specific data will be gathered to evaluate the effectiveness of the selected remedy and to determine site risks." The Navy did not address this suggestion in its response to the comment.

The Navy should review the RI report and remove all text, tables, etc., associated with the SUTRA and the AT123D models. In addition, any estimations, predictions or conclusions based on the model simulation should be removed from the report. Instead of relying on a model simulation of questionable basis, the Navy should apply the site-specific data to evaluate the discharge of contaminated groundwater to the offshore environment. This should include contaminant concentrations in the near shore wells, borehole logging results by the USGS, geologic formation data (e.g., groundwater gradient, hydraulic conductivity, grain size, salinity, etc.) and contaminant characteristics. This use of site-specific data will result in a conservative approach that is considered more reliable and more representative than the results of the model simulations.

Comment 2, et. al., B. EPA commented that the current modeling results should not be used for any other application except future site characterization and that the RI should be amended to state this emphatically. The Navy agreed to remove the section of the report which presents the results of the transport modeling underneath and beyond the entrance channel; however, the Navy did not state that the limitations of the model would be added to the report. It is the position of EPA that all references to the model and the results be removed from the RI report.

Comments 5, 8, 38, 93 and 111: EPA pointed out an apparent area gap in the hydroprobe survey with respect to the location of potential DNAPL on the bedrock surface which, if present, would be a continuing source of contamination. The Navy states that it should be noted that "the purpose of the hydroprobe work was to aid in effective selection of locations for new monitoring wells and the hydroprobe work was completed long before the groundwater was sampled from MW07-04D, -15D, and -17D." However, Section 2.3.2.2, Stage 2 (Hydroprobe Survey), Chapter 2, Page 4 of the Phase III RI report, states:

> "The objectives of the hydroprobe survey were to:
>
> - Provide screening-level chlorinated VOC data for ground-water in the upper sand unit and the till unit beneath Site 07 to aid in the selection of Stage 3 soil boring and monitoring well locations; **and**

- **Aid in the location of potential chlorinated VOC source areas** and estimation of the extent of the chlorinated VOC previously detected in the Phase II RI ground-water samples..."

However, it is not agreed that the specific area in question has been investigated sufficiently. Regardless of the initial objectives, it is prudent to further investigate the specific area in question. Previous investigations showed that the 1% criterion which infers the presence of NAPL (see Draft Final Phase III RI Report, Section 5.1.3., Non-Aqueous Phase Layers, Chapter 5, Page 5) was exceeded for TCE in MW07-17D (note that TCE was detected at 10.9% in this well), MW07-04D, MW07-05D, MW07-05R, and MW07-15D (see Draft Final Phase III RI Report, Section 5.1.3.3, Site Evaluation, Chapter 5, Page 8). The 1% criterion was also exceeded for 1,1,2,2-PCA in MW07-04D, MW07-05D, MW07-15D, and MW07-17D. Due to the occurrence of these exceedances, additional effort is warranted in the area surrounded by former hydroprobe locations HP-06, HP-07, HP-05 and HP-03 to locate potential DNAPL on the bedrock surface.

As stated previously, there is potential for the site risks to increase in the future as the plume migrates and discharge to onshore (i.e., wetlands area, shoreline seeps) and offshore areas. A better understanding of the contamination in this area and the potential presence of DNAPL would provide useful information for determining the feasibility of extracting potential DNAPL and provide a possible future contingency plan in the event that risks become unacceptable.

Additional hydroprobe samples could be collected in this area during the hydroprobe sampling efforts which are currently planned to determine the locations of additional monitoring wells necessary for the LTMP.

Comment 144. The Navy states that if additional data indicates that VOC may be discharging to the interior wetlands, then the Navy will include samples in the wetland area to the monitoring program. The latest Conceptual LTMP (dated 7/17/97) includes the collection of one sediment sample from the wetlands area.

Since the discharge of groundwater to the wetlands area may be seasonally-dependent, the Navy will need to monitor the water levels in the wells and piezometers on a frequent basis to demonstrate that groundwater is not discharging to this area. In addition, since surface water and sediment samples have not been collected from the wetland area in the past, samples should be collected and analyzed to provide baseline information. If it is determined that contaminated groundwater is discharging to the wetlands area, additional sampling will be warranted as stated in the Conceptual LTMP.

RIDEM COMMENTS

Comment 13. RIDEM requested further samples from the harbor be collected to verify the

conclusions rendered by the Fate and Transport model. Since the conclusions rendered by the models are being removed, the need to validated these models does not apply. However, the need to evaluate potential discharge points from the site is needed. The Navy is proposing further sampling as part of their proposed Conceptual Long Term Monitoring Plan (CLTMP) but does not include the collection of additional surface water or sediment samples from either the harbor or the bay. The Navy should take advantage of the barge sampling opportunity that is presented by the sampling being done at the Landfill and sample off Calf Pasture Point to gather site specific geologic information.