



United States Environmental Protection Agency  
One Congress Street, Suite 1100 (HBT)  
Boston, MA 02114-2023

December 12, 2000

Mr. John Mayhew  
DoN, Northern Division - NAVFAC  
10 Industrial Highway  
Code 1811/JM - Mail Stop 82  
Lester, PA 19113-2090

Re: Construction Engineering Division (CED) Area Draft Proposed Plan at the former Naval Construction Battalion Center (NCBC) Davisville, RI

Dear Mr. Mayhew:

Pursuant to § 7.6 of the Davisville Naval Construction Battalion Center Federal Facility Agreement dated March 23, 1992, as amended (FFA), the Environmental Protection Agency (EPA) has reviewed the subject document and our comments are enclosed.

The Base Realignment and Closure (BRAC) Cleanup Team (BCT) had agreed to propose a CERCLA interim remedy of no action for soils and groundwater use restrictions and monitoring with 5-year reviews and a voluntary action by the Navy of land use restrictions due to the fact that the state cleanup standards are lower than the CERCLA cleanup standards. This draft does not reflect this agreement. Please revise this document to let the public know what the Navy will be proposing to do at these sites. The public should be made aware that the imposition of land use restrictions is not enforceable under CERCLA and is being proposed voluntarily by the Navy due to RIDEM requirements. The land use restrictions will only be enforceable by RIDEM.

If you have any questions with regard to this letter, please contact me at (617) 918-1384.

Sincerely,

A handwritten signature in black ink, appearing to read "Christine Williams", written over a circular stamp.

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

Enclosure

cc: Richard Gottlieb, RIDEM  
Walter Davis, CSO

12046

Dave Peterson, EPA  
Mary Sanderson, EPA  
Marilyn Cohen, ToNK  
Howard Cohen, RIEDC  
Anne Heffron, Enviro-Tech  
Dinalyn Spears-Audette, Narragansett Tribe  
Eileen Cury, Gannett Fleming  
Jim Shultz, EA Engineering, Science and Technology

## EPA Comments on Draft PP for CED Area

1. Page 1, first ¶, indicate early on (and consistently throughout this document) that this proposed plan will be proposing an INTERIM remedial action - not a final remedial action per “*A Guide to Preparing Superfund Proposed Plans, Record of Decision, and other Remedy Selection Decision Documents*” EPA 540-R-98-031, OSWER 9200.1-23.P, dated July 1999.
2. Page 1, first ¶, the first sentence should be changed to state that “...this Proposed Plan presents the preferred interim remedial action...”
3. Page 1, first ¶, add a new second sentence that describes the voluntary soil restriction that are being done to meet State, rather than CERCLA standards. A possible example: “In addition, although not required or enforceable under CERCLA, the Navy’s proposed remedy will address an area of soils that require protective measures under State standards.”
4. Page 1, new second ¶, insert the first ¶ from page 2 second column.
5. Throughout the document, please change the proposed “remedial alternative” and “remedial action” to “interim remedial alternative” and “interim remedial action”.
6. Page 1, second ¶, in the second sentence change “(EPA) Region I” to “(EPA), New England”.
7. In the last sentence add at the end: “as an interim action pending remediation of off-site contaminated groundwater entering onto the Site. In addition, although not required or enforceable under CERCLA, the Navy’s will implement institutional controls, in the form of deed restrictions, on an area of soils in [the area the restrictions are required] that require protective measures under State standards.”
8. Page 1, last ¶, the administrative record is only kept at the CSO. Please change the text to be accurate.
9. Page 2, first ¶, please note that due to the space constraints at the North Kingstown Library, only the most current documents should be maintained for review for the public. Please evaluate the need for the documents that are currently at the library and only maintain the current documents at the library. The public should be able to contact the CSO for review of historical documents. Please change the text to reflect this. The Navy has been working on putting the administrative record for all the previous RODs on CD ROM. When will these CDs be available to the BCT and to the Library?
10. Page 2, 1<sup>st</sup> column, 1<sup>st</sup> bullet - at the end of the first sentence add: “under federal standards.”

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standards.”

11. At the end of the second sentence add: “, however, in order to meet State standards, institutional controls, in the form of deed restrictions, will be placed on a limited area of soils in [name of area or site where control needed].
12. Page 2, 1<sup>st</sup> column, 2<sup>nd</sup> bullet - insert “source” after “(as a drinking water”.
13. Page 2, 2<sup>nd</sup> column, 1<sup>st</sup> bullet - add at the end: “and to monitor migration of contaminated groundwater from the off-site source.
14. Page 3, second ¶, please indicate that the NIKE site is to the west of the CED area.
15. Page 3 and 4, please remove the IAS, CS, RI and SASE information. The paragraph under the title of “Completed Field Investigations” should be augmented with this list of the investigations for review at the CSO.
16. Page 6-7, Alternative 2 - need to describe the soil institutional controls being taken to meet state standards.
17. Page 7, 2<sup>nd</sup> column, 1<sup>st</sup> ¶ - need to describe the soil institutional controls being taken to meet state standards.
18. Page 7, 2<sup>nd</sup> bullet - change “and (3)” to “, (3)” and add at the end “, and (4) monitor migration of off-site contaminated groundwater onto the Site.”
19. Page 7, new third bullet, “This Interim Remedy will be consistent with the final remedy to be implemented after an enforceable final Former NIKE PR-58 source area remedy has been decided upon.”
20. Page 7, fifth bullet describing why ground water treatment is not warranted, remove the portion of the sentence “because finding and treating chlorinated VOCs contained in bedrock fractures may be technically impracticable” as this has not yet been proven for this Site.
21. Page 9, add the definition of “Interim” as described in chapter 8 of the July 1999 EPA Guidance on the preparation of Superfund Proposed Plans, etc.
22. Table 2, change to “No” for ARARs identified since the No Action Interim Alternative does have chemical specific ARARs, MCLs, but doesn’t meet them.

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23. On the figures where it isn't included already, label the Site boundaries and the location of the adjacent Nike site.
24. Figures 3-6, these figures have information determined in past investigations. Please update these figures with more current information. The Navy has subsurface lithology, groundwater level measurements, and validated analytical data from this year's groundwater sampling rounds which should be included in this plan.
25. Figure 7, this figure may be required to be changed to present the public the most current information once the BCT has evaluated the an RI due to be submitted mid-January 2001.