RESPONSES TO RIDEM COMMENTS FOR DRAFT DETAILED ANALYSIS OF ALTERNATIVES REPORT SITE 11 - FIRE FIGHTING TRAINING AREA NAVAL CONSTRUCTION BATTALION CENTER DAVISVILLE, RI

GENERAL

These are responses to RIDEM's comments to the document entitled "Draft Detailed Analysis of Alternatives Report Sites 10 & 11". RIDEMs comments are contained in their letter dated 27 June 1994.

Comments pertaining to Site 11 are only addressed in this document. Since a removal action is scheduled for Site 10, comments pertaining to this site will be addressed later under a separate cover.

As suggested by EPA, ground water at these sites is designated as a new operable unit. Therefore, comments pertaining to ground water at these sites will be addressed later under a separate cover. However, general information pertaining to ground water including depth, flow direction, and levels of contamination will be included in the DAA reports. Comments pertaining to this general information are addressed in this document.

1. **General Comment**

Please insert a list of acronyms to make the document more readable for public review.

Response: The document will be revised as requested.

EXECUTIVE SUMMARY

2. **Page ES-3, Background:**
   Paragraph 1, Sentence 4.

   Please explain why risks were not evaluated for a residential future use scenario. If the Army should ever excess this land a residential use scenario could be possible.

Response: Comments pertaining to Site 10 will be addressed later under a separate cover since a removal action is scheduled at this site.

Last sentence:

The site is a firing range; it is highly unlikely that lead is not a "site-related" contaminant. The "site" is all navy property at the time of listing on the NPL.

Response: *Comments pertaining to Site 10 will be addressed later under a separate cover since a removal action is scheduled at this site.*

3. **Pages ES-5 and ES-7, Feasibility Study Summary - Alternative 2: Last Sentence, Alternative 3: Paragraph 4, Sentence 1.**

Deed restrictions preventing the use of ground water should be implemented at this time rather than at the time the Army excesses the property. If the water is not acceptable for the public to drink in the future the Army should be prevented from inadvertently drinking it in the present.

Response: *Comments pertaining to site 10 will be addressed later under a separate cover as a removal action is scheduled at this site.*

4. **Table ES-9 and Table ES-18, Notes Below Tables**

Alternatives GW-3A, GW-3B, GW-3C, etc. have not been defined within the text of the Executive Summary. Either this reference should not be provided in this table or a reference should be provided indicating where a description of these alternatives can be found. If possible, a description of these alternatives should be provided in this Table.

Response: *Ground water at Sites 6, 13, and 11 has been designated as a separate basewide operable unit. This comment will be addressed as part of the RI/FS for the ground-water operable unit.*

5. **Page ES-11, Last Sentence:**

"Therefore, no remedial action objectives were developed for catch basin sediments at Site 11".

Storm water discharges from Site 11 may be subject to the RIPDES Storm Water Discharge Requirements. Discharges from other sites, as well as the base as a whole may also be subject to these same requirements. The Division recommends that the Navy contact the Division of Water Resources concerning discharge requirements.

Response: *The Navy has taken this comment under consideration.*

VOLUME I

6. **Page 1-10, Section 1.4.2, Regional Hydrogeology: Paragraph 2, Last Sentence.**

Please note that the water quality standards cited for manganese and iron are secondary standards related to aesthetics and are therefore not health based.

Response: *The text will be revised to indicate that manganese and iron "usually do not exceed secondary drinking water standards related to aesthetics."*

7. **Page 3-3, Paragraph 2, Last Sentence:**

"Well 10-MW5D is located upgradient of the northernmost disposal area."

Based upon Figures 2-5 and 2-6 the contours appear to be too close to establish this well as an upgradient well. Please explain how this established, cite the margin of error, and discuss how seasonal water table fluctuations could effect this site.

Response: *Ground water at Sites 6, 13, and 11 has been designated as a separate basewide operable unit. This comment will be addressed as part of the RI/FS for the ground-water operable unit.*

8. **Page 4-15, Section 4.4.5, Alternative GW-3, Fourth Paragraph:**

Again, the report states that lead is not site related; given that the site is a firing range lead cannot be dismissed as non-site related. Additionally, the report states that well 10-MW5D is upgradient; this is apparently based on a one inch difference in elevation over several hundred horizontal feet. The Department requires the results of the lead studies being conducted for the berms surrounding the site which the Navy is currently undertaking.

Response: *Ground water at Sites 6, 13, and 11 has been designated as a separate basewide operable unit. This comment will be addressed as part of the RI/FS for the ground-water operable unit.*

VOLUME III

23. ***Page 2-3, Section 2.3.2, Site Hydrogeology: Paragraph 3, Sentence 3.***

Since this is a public document please explain what constitutes a low, medium or moderate, and high downward vertical transport rate.

Response: *The discussion of the vertical hydraulic gradients was presented in such a way as to put the calculated gradient numbers into perspective qualitatively so that the public could understand what the values mean in terms of general movement of*

water in the ground. Further definition of specific values of what low, medium, or moderate, and high downward vertical transport rates mean would not greatly enhance the public's knowledge of what is occurring at the site and would defeat the purpose of the more qualitative discussion.

24. **Page 2-4, Section 2.3.2, Site Hydrogeology: Paragraph 1, Sentence 3.**

Please explain the basis for assuming an effective porosity of 20%.

Response: *An effective porosity value of 20% was assumed based on the silty sands at the site. This value was obtained from a document prepared by the Electric Power Research Institute (EPRI, 1985). A reference to this document will be included in the DAA report.*

25. **Page 2-15, Section 2.7, Summary of Contaminant Fate and Transport: Paragraph 3, Sentence 3.**

Site 13 should be changed to Site 11.

Response: *The text will be revised as requested.*

26. **Page 3-12, Section 3.5, Remedial Alternative Development: Paragraph 2.**

Since this is a public document some discussion, beyond what is contained in Table 3-6, should be provided to explain why certain alternatives have been screened from further consideration.

Response: *Ground water at Sites 6, 13, and 11 has been designated as a separate basewide operable unit. This comment will be addressed as part of the RI/FS for the ground-water operable unit.*

27. **Page 4-3, Section 4.2.1, Alternative 1 - No Action Alternative description: Paragraph 1.**

Please explain why antimony is not mentioned in this section since this was found in high levels in the ground water.

Response: *Ground water at Sites 6, 13, and 11 has been designated as a separate basewide operable unit. This comment will be addressed as part of the RI/FS for the ground-water operable unit.*

28. **Page 4-4, Section 4.2.2, Alternative 1 - No Action Alternative Evaluation, Overall protection of Human Health and the Environment:**
Paragraph 1.

Please explain why lead is not mentioned in this section.

Response: *Ground water at Sites 6, 13, and 11 has been designated as a separate basewide operable unit. This comment will be addressed as part of the RI/FS for the ground-water operable unit.*

29. ***Page 4-11, Section 4.2.7, Alternative 3A - Ground Water Extraction via Interceptor Trench and Extraction Wells Option Description:***
Paragraph 1, Sentence 1.

If the extraction rate is 4.5 gpm, please explain why the system will be designed to treat 10 gpm.

Response: *Ground water at Sites 6, 13, and 11 has been designated as a separate basewide operable unit. This comment will be addressed as part of the RI/FS for the ground-water operable unit.*

30. **Page 4-12, Section 4.2.9, Alternative 3B - Precipitation Inorganic Treatment Option Description:**
Paragraph 2, Sentence 1.

It should not be assumed that the chemical precipitation treatment system will contain a filtration unit. If this is what is needed to make this alternative viable then it must be included as part of the alternative.

Response: *Ground water at Sites 6, 13, and 11 has been designated as a separate basewide operable unit. This comment will be addressed as part of the RI/FS for the ground-water operable unit.*

31. **Page 4-15, Section 4.2.11, Alternative 3C - Electrochemical Inorganic Treatment Option Description:**
Paragraph 1, Sentence 3.

Please state whether this system can remove manganese since it removes a number of other inorganics.

Response: *Ground water at Sites 6, 13, and 11 has been designated as a separate basewide operable unit. This comment will be addressed as part of the RI/FS for the ground-water operable unit.*

32. ***Figure 4-2, Site 11 - Fire Fighting Training Area Chemical Precipitation Schematic:***

Unless it can be demonstrated that the water discharge from the filter press does not contain high levels of metals this effluent should be directed back to the equalization tank rather than to pH adjustment with subsequent discharge to the environment.

Response: Ground water at Sites 6, 13, and 11 has been designated as a separate basewide operable unit. This comment will be addressed as part of the RI/FS for the ground-water operable unit.