



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

DIVISION OF AIR AND HAZARDOUS MATERIALS
291 Promenade Street
Providence, R.I. 02908-5767

16 March 1993

Marilyn Powers, Remedial Project Manager
U.S. Department of the Navy
Northern Division-NAVFAC
10 Industrial Highway
Code 1823-Mail Stop 82
Lester, PA 19113-2093

RE: Risk Assessment Technical Memo
Naval Construction Battalion Center-Sites 12 and 14

Dear Marilyn:

Please find attached this Division's comments on the abovementioned document. The Division requests a written response to these comments from the Navy prior to or upon submission of the draft Proposed Plan for Sites 12 and 14. The Division also wants to remind the Navy that the goal for this plan is to achieve the DEM regulatory level of 10 ppm or 2ug/100cm² on all surfaces.

If you have any questions, please contact me at 277-2797.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey Crawford".

Jeffrey Crawford
Senior Engineer
Division of Site Remediation

cc: W. Angell
J. Graham
M. Daly-USEPA
J. Oliva-TRC

RATM.LET/jc

RISK ASSESSMENT TECHNICAL MEMO
NAVAL CONSTRUCTION BATTALION CENTER
Sites 12 & 14 - PCB contamination

COMMENTS:

1. Page 3 - Bottom of page

Remove the words "Proposed Rules and Regulations for the Investigation and Remediation of Hazardous Materials Release" and insert "Proposed Amendments to Rules and Regulations for Solid Waste Management Facilities and the Rules and Regulations for Hazardous Waste Management". Copies of these proposed changes were distributed at the project managers meeting on March 2, 1993.

2. Page 4 - paragraph 1, Risk Evaluation

" Under potential future use conditions, the anticipated use of these buildings is industrial".

Please insert the words "and commercial" at the end of the sentence.

3. Page 4 - General

The Division recommends that language be inserted into the proposed plan which states that the Navy will be addressing potential PCB dust on the interior surfaces of the building as part of final cleanup verification.

4. Page 5 - General Comment, paragraph 1, last two sentences

Contrary to the stated federal policy, this Division considers any estimated existing cancer risk exceeding the **lower end** of the acceptable risk range (1×10^{-6}) a potential cancer risk.

5. Page 5 - paragraph 2

" RIDEM has also proposed standards which define a PCB release ($2\mu\text{g}/100\text{cm}^2$) for surfaces and 10 ppm for environmental media".

This statement is wrong. The abovementioned concentrations can be found in the proposed amendment definition of "solid waste" Section 3.50 . There is no reference as to the definition of a release. Also, this proposed definition relates specifically to soils and solid surfaces and not ground water and surface water. The term *environmental media* should be clarified.

6. Page 6, paragraph 1

" Assuming that the contaminated area is remediated to 10 ppm (which corresponds approximately to the proposed RIDEM surface concentration standard of 2ug/100cm2 ...)"

Remove the information in the parentheses. Under the proposed definition of Solid Waste Section 3.50, " Solid waste shall include any soil, debris or other material with a concentration of PCB's of ten parts per million (10ppm) or greater, or which contains two micrograms or greater of PCB's per one hundred square centimeters (2ug/100cm2) via a wipe test..."). These values are **not** interchangeable.