



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 1

JOHN F. KENNEDY FEDERAL BUILDING  
BOSTON, MASSACHUSETTS 02203-0001

August 19, 1998

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: Risk Assessment to Support Site 12 & 14 ESD, dated August 5 & 6 1998, former Naval Construction Battalion Center (NCBC), Davisville, Rhode Island

Dear Mr. Otis:

The purpose of this letter is to provide comments on the subject documents.

The risk assessment was performed using acceptable procedures that have been used at Davisville, NCBC and conform to our risk assessment guidance. The maximum expected cancer and non-cancer risks were determined to be protective of child residents.

The original cleanup level set in the ROD, signed in September 1993, was 10 ppm for total PCBs which is the level that would be protective of industrial workers not residential inhabitants. Therefore, the ROD also required the Navy implement institutional controls that included land-use deed restrictions to be protective of human health and the environment.

However, the 95% UCL of the actual confirmatory sample results indicated that the Navy had achieved a much lower clean-up level across site 12; <2ppm. This actual clean up level is protective of unrestricted use. Therefore, as the lead agency the Navy should prepare for the record an explanation of significant differences (ESD) to the selected Remedy which should note that the achieved clean up level across the site was <2ppm total PCBs, protective of future residents and therefore, no institutional controls are required at site 12.

In addition, the 95% UCL of the actual confirmatory sample results indicated that the Navy had achieved a lower clean-up level across site 14 also; <4ppm. This actual clean up level is also protective of unrestricted use. Therefore, as the lead agency the Navy should prepare for the record an explanation of significant differences (ESD) to the selected Remedy which should note that the achieved clean up level across the site was <4ppm total PCBs, protective of future residents and therefore, no institutional controls are required at site 14.

If additional contamination is found which changes the 95%UCL to be greater than 4 ppm, the Navy will be required to implement institutional controls to restrict land use to industrial at the very least and may be required to perform additional concrete and soils removal if the maximum

concentration is found to be above 10 ppm total PCBs.

The human health risk assessment conclusions and backup information should be readily available to all future transferees and should be summarized in the EBST for both the West Davisville parcel and the Warehouse Triangle parcel.

I look forward to working with you and RIDEM to draft the ESD for sites 12 & 14 and the FOSTs for the parcels on which they are located. If you have any questions with regard to this letter, please contact me at (617) 573-5736.

Sincerely,



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

cc: Richard Gottlieb, RIDEM  
Walter Davis, CSO  
Cindy Hanna, EPA  
David Peterson, EPA  
Mary Sanderson, EPA  
Linda Rutsch, EPA Headquarters  
Richard Kerbel, Town of North Kingston  
Richard Erwin, RIEDC  
Bryan Wolfenden, RI RC&DC, Inc.  
Marjory Myers, Narragansett Tribe  
Eileen Curry, Dynamac Corporation  
Jim Shultz, EA Engineering Science and Technology