



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203-0001

N62578.AR.001402
NCBC DAVISVILLE
5090.3a

September 17, 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: Draft Fact Sheet 11, Explanation of Significant Differences (ESD) for the Record of Decision (ROD) for Installation Restoration Program Sites 12 and 14, dated August 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 document. Comments are enclosed.

I look forward to working with you and RIDEM to finalize 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,

A handwritten signature in cursive script, appearing to read "Christine Williams".

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
Mark House, Resource Controls
Marjory Myers, Narragansett Tribe

Eileen Curry, Dynamac Corporation
Jim Shultz, EA Engineering Science and Technology

1. This fact sheet style ESD is sufficient to document the significant difference to the ROD. An additional document is not necessary. Change the title to: "Explanation of Significant Difference for the Record of Decision for Installation Restoration Program Sites 12 and 14."
2. Page 1, Summary Box - An additional change to be noted is that due to the level of site cleanup, no 5-year review will be required.
3. Page 1, Description of the ESD - Also add a statement that the 5-year review called for in the ROD is no longer required. See comment 1.
4. Page 2, 1st col., 1st para., 3rd sentence - Change "(institutional controls)" to "(institutional controls and 5-year review)".
5. Page 2, first column, second paragraph, second line. Add " and supporting information" after the words, "this ESD". As noted in the second to the last paragraph in my letter to you dated August 16, 1998, the remedial action (RA) complete closeout reports for both sites along with the resulting human health risk assessment (HHRA) must be included in the administrative record in order to provide the public with the rationale for the ESD.
6. Page 3, footnote 1 - The RI Remediation Regs. are not ARARs, since they are not cited in the ROD, ROD signed prior to the Regs. promulgation. Therefore, cite the risk standard used in the ROD which set the 10 ppm cleanup level in the footnote. I wouldn't recommend opening the ROD to look at changing all the ARARs, as that would cause a ROD amendment to be necessary and a delay in the transfer.
7. Page 3, second column, first and second paragraphs. Include both the closeout report and the HHRA in the administrative record for the sites.
8. Page 3, 2nd col., last para., 2nd sentence - Add at the end "and a 5-year review to reassess the protectiveness of the remedy."
9. Page 4, first column, first and second paragraphs. Include both the closeout report and the HHRA in the administrative record for the sites.
10. Page 4, 1st col., 3rd para., 3rd sentence - Add a new 4th sentence: "Furthermore, a 5-year review was required to reassess the protectiveness of the remedy."
11. Page 4, 1st col., 4th para., 2nd sentence - Add at the end "and a 5-year review to reassess the protectiveness of the remedy."
12. Page 4, 1st col., 4th para., 4th sentence - Remove, the state Remediation Regs. are not an ARAR under the ROD.
13. Page 4, 1st col., 4th para., last sentence - Add at the end: "and no 5-year review is required."

14. Page 4, second column, second paragraph. Rewrite the first sentence to read, "The HHRA for site 12 indicated that risk values for residual PCBs in concrete and soil are within the EPA's acceptable cancer risk range of 10^{-4} to 10^{-6} and the non-cancer risks are slightly above 1.

15. Page 4, 2nd col., 2nd para., last sentence - This sentence appears to imply that the site will only be safe for residential development if the building is demolished and removed. What is a "low or negligible non-cancer risk" since the term is already used to describe the level of risk present with the building in place? Provide the actual numbers.

16. Page 4, 2nd col., 3rd para., last sentence - Add at the end: ", nor is a 5-year review required."

17. Page 5, first column, first paragraph. Add the following to the end of the second sentence, "...and has included the ESD and supporting information in the Administrative Record for the sites."