



**Response to RIDEM Comments
(Dated 19 November 1997) on the
Preliminary Draft No Further Action Decision Document
Building 56
Naval Construction Battalion Center
Davisville, Rhode Island**

Contract No. N62472-92-D-1296
Contract Task Order No. 0046

Prepared for

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**NAVY RESPONSE TO RIDEM COMMENTS (DATED 19 NOVEMBER 1997) ON THE
PRELIMINARY DRAFT NFADD FOR BUILDING 56**

NCBC DAVISVILLE, RHODE ISLAND

Comment 1. Executive Summary Page 1, Paragraph 2, Last Sentence. The disposal of the remaining concrete rubble is ongoing and a close-out report is planned to be completed in November 1997. Please be advised that prior to RIDEM concurring on the no further action all removal activities associated with the site must be complete and the close-out report approved.

Response 1. *The comment is noted. The Contractor Closeout Report is scheduled to be issued at the end of January 1998.*

Comment 2. Page 3-1, Section 3.1.2, Basewide Environmental Baseline Survey; Paragraph 1, Sentences 5 and 6. Sentence 5 states that two empty, rusted 55 gallon drums were found on the south side of the building. Sentence 6 states that no abandoned drums were found on the exterior or interior of the building. These sentences seem contradictory. Please clarify.

Response 2. *The text will be edited to remove "no abandoned drums" from Sentence 6 to correct the contradiction.*

Comment 3. Sections 3.2.1 (Surficial Soil Sampling), 3.2.2 (Subsurface Soil Sampling), 3.2.3 (Drain Sampling), & 3.2.4 (Wipe Sampling). Please reference Tables, within these paragraphs, where the analytical results can be found.

Response 3. *Section 3 summarizes the previous investigations but the data are not discussed in Chapter 3. Therefore, there are no tables referenced in Chapter 3. Chapter 4 summarizes the data in tables as they are discussed, within the text and will be numbered, as requested. Other available data will be included in appendices and referenced.*

Comment 4. Page 4-1, Section 4.1, Screening Criteria for Data Analysis; Paragraph 1, Last Sentence. Data were compared to both RIDEM and EPA screening criteria, because both regulatory agencies are actively involved in the site investigation. Please change to: Data were compared to both RIDEM and EPA screening criteria, as required by each agencies regulations.

Response 4. *The text of the report will be edited to note that "data were compared to both RIDEM and EPA soil screening criteria" but will not include "as required by each agency's regulations." While the state of RI has enforceable standards for*

hazardous material releases to soil and ground water and the EPA has standards for drinking water (MCLs), EPA only has screening criteria (or guidance) for soil.

Comment 5. Page 4-2 to 4-3, Section 4.1, Screening Criteria for Data Analysis; Last Sentence Page 4-2, First Sentence Page 4-3. Please state in this sentence the one analyte for which the EPA Generic SSLs were used.

Response 5. *The text in section 4-3 will be corrected. The EPA Generic SSLs for residential soil ingestion were not used and will be deleted from the tables.*

Comment 6. Page 4-19, Section 4.3.2, Waste Characterization and Disposal; Paragraph 1, Sentence 1. As noted in comment #1, RIDEM will not approve the no further action for this site until all work has been completed and the close-out report has been approved.

Response 6. *Agreed.*

Comment 7. General Comment. It is RIDEM's understanding that the State of New Jersey has rescinded their screening levels for accessible surfaces (wipe samples) of interior buildings (Tables 4-5 in this report). If this is the case, then this Table and all discussion in the report relating to these values should be removed as the rationale is based on criteria which are no longer being used.

Response 7. *Agreed. We are checking to see which guidelines (not standards) NJDEP may have retained. The information was reported in the NFADD because it was part of the SASE. Since the building has been demolished, the interior building data are not currently relevant. Further, if the samples were taken from concrete (porous) surfaces (the floors in Building 56 were described as concrete slab), then the wipe sample results may have been biased high. Wipe samples should be collected from non-porous surfaces only.*

Comment 8. General Comment. It is understood that this site is being cleaned up to commercial/industrial standards in accordance with the base re-use plan; therefore, residential use would be unacceptable for this parcel at this time.

Response 8. *Agreed. The residential criteria are discussed so the deed restrictions or activity and use limitations can be considered if warranted.*