



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-831-5508

5 November 1999

Mr. Emil Klawitter, Remedial Project Manager
US Department of the Navy, Northern Division
Code 1811/EK, Mail Stop #82
10 Industrial Highway
Lester, PA 19113-2090

RE: Navy Response To RIDEM Comments
Draft Site 16 SASE
NCBC Davisville, Rhode Island
Submitted 14 October 1999

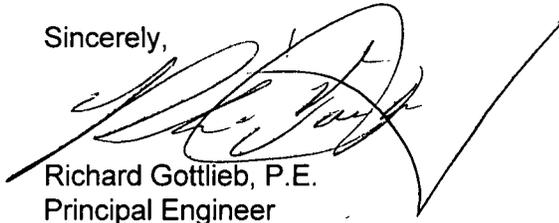
Dear Mr. Klawitter;

The Rhode Island Department of Environmental Management, Office of Waste Management (RIDEM) has reviewed the above referenced responses and comments are presented below:

1. RIDEM comment #3 addressed the use of DAF-1 versus DAF-20 criteria for soil. The Navy stated that DAF-20 criteria are appropriate to this site and that further action utilizing DAF-1 criteria would no longer be considered. DAF-1 criteria are appropriate for sites with shallow water tables where little or no dilution would take place between the source and the receptor. The soil in the area of the seeps would fit this category as the water is at the surface where little dilution would be afforded in going from the soil to the water. Therefore, RIDEM reiterates that DAF-1 criteria should be applied in these areas.
2. RIDEM comments 4, 6, 8, and 9 addressed the evaluation of exposure criteria based on commercial/industrial land use versus residential land use. As the Navy points out, the land in question is zoned for commercial/industrial use. In determining which direct exposure criteria to apply, RIDEM considers zoning, however, more important is the current and foreseeable future use of the land. The current and foreseeable future use of this parcel is for a marina, which under the Remediation Regulations require that residential exposure criteria apply, as the marina would be considered a recreational use. RIDEM reiterates that when a screening or risk analysis be done, that residential criteria be applied.

If you have any questions or require additional information please call me at (401) 222-2797 ext.7138.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard Gottlieb', with a long, sweeping horizontal stroke extending to the right.

Richard Gottlieb, P.E.
Principal Engineer

cc: W. Angell, OWM DEM
C. Williams, EPA Region 1
H. Cohen, RIEDC

S. Licardi, ToNK
W. Davis, CSO NCBC
J. Shultz, EA Eng.

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