

**RESPONSES TO COMMENTS (16 JUNE 1999) FROM APPLIED ENVIRONMENTAL
INC, TECHNICAL ADVISOR FOR THE TAG, AND ON BEHALF OF THE RHODE
ISLAND RESOURCE CONSERVATION & DEVELOPMENT COUNCIL, INC. (RE
RC&D) ON THE DRAFT - STUDY AREA 16 (CREOSOTE DIP TANK AND FIRE
FIGHTING TRAINING AREA) COMPREHENSIVE REPORT /STUDY AREA
SCREEN EVALUATION AT NCBC DAVISVILLE, RI**

General Comments

Comment 1. Why were groundwater samples obtained utilizing hydraulically driven probes as opposed to augered wells and was sufficient groundwater available in those wells to insure sufficient well development and water volume for representative samples?

Response: Because this was a Study Area Screening Area Evaluation, not a remedial investigation. This work resulted in the recommendation that a remedial investigation be performed. The draft work plan for that remedial investigation is now being reviewed by the BCT.

Comment 2. Page 2 of the executive summary and page 4 of Chapter 1 discusses a previous investigation of Study Area 16 that included a 1992 soil removal action. TPH compounds were left behind at a documented level. How do those levels of contaminants compare with RI DEMs current objectives?

Response: Page 4 of Chapter 1 states that 'some PAH remained'. Because of that, the Phase II EBS field work included the collection of soil samples from four locations (28-SB-01A through -01D) of the creosote dip tank excavation area to document remaining PAH concentrations, as stated on Page 5 (second paragraph) of Chapter 1 and shown on Figure 1-3. The results of those Phase II EBS samples were included in the SASE and the results are shown on Figures 5-1 through 5-3. **(Emil, EA had not received a copy of the 1993 Halliburton NUS report that apparently documents their soil removal action. Apparently a copy could not be located. We then had apparently used statements in later reports that excerpted material from the 1993 report.)**

Comment 3. The recommendations of this study should include ecological as well as human health risk evaluations.

Response: The recommendations will not be changed. However, the following will be added to the text: An additional recommendation from the TAG is to include an evaluation of risk to the environment from site constituents.

Comment 4. The recommendations state additional remedial actions are not anticipated for soil based on current data. This recommendation is premature and inconsistent with an earlier recommendation to identify the source area for CVOC's.

Response: The CVOC were detected in samples of the 'deep' ground water. The referenced sentence is a correct statement of what the Navy anticipates at this time. Should the results of the remedial investigation indicate a need for 'additional remedial actions', such actions would be addressed in the related Feasibility Study.

Comment 5. Why was the Total Petroleum Hydrocarbon (TPH) analysis 418.1 utilized for soil samples as opposed to the 8100 series or Extractable Petroleum Hydrocarbon (EPH) method?

Response: This was requested by RIDEM.

Comment 6. Recommendations in this report do not include further work for the SVOC's or arsenic lead and beryllium in soil even though concentrations of those compounds exceeded the RI DEM Direct Soil Exposure Criteria and/or EPA Region IX Residential RBC. What is the justification for dropping these compounds from further study? Metals in groundwater were field filtered according to this report. How were background levels of metals in groundwater sampled? Doesn't EPA Methodology require low flow sampling for metals and can these two sampling methodology results be compared reliably?

Response: The recommendations will not be changed. However, the following will be added to the text: An additional recommendation from TAG is to include SVOC and metals to the analytical program for soil samples.

Ground-water sample aliquots for metals analysis were filtered because they were collected from a push-probe sampling device and filtering was necessary to minimize turbidity in the acid-preserved sample containers. Again, this was a Study Area Screening Area Evaluation, not a remedial investigation.