



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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NCBC DAVISVILLE
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5 December 2000

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

RE: Navy Response to RIDEM Comments
Work Plan Addendum
Remedial Investigation of IR Program Site 16
(Former Creosote Dip Tank and Fire Fighting Training Area)
Naval Construction Battalion Center
Davisville, Rhode Island
Submitted 29 November 2000, Dated 28 November 2000

Dear Mr. Mayhew;

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

- RIDEM Comment 3 -Page 3-2, Section 3.3, Human Health Risk Assessment** – The protocol for the human health risk assessment is described in the Work Plan dated March 2000. In Section 3.3.1 of the March 2000 work plan it is stated that the site will be evaluated for a commercial/industrial scenario, however, a residential exposure scenario will be evaluated to assess the potential for unrestricted transfer of the property. It is implied that if the results of the sampling do not meet residential standards then a deed restriction will be placed on this parcel of land. The parcel is currently utilized as a yacht club and this use is reasonably anticipated into the future. Under the RIDEM Remediation Regulations (amended 1996) this is a recreational use for which the residential standards are applied. Given the current and future use of the site, the human health risk assessment should focus on a residential scenario. If the site does not meet residential standards then more than a deed restriction may be necessary to allow for the continued use of the site. **Navy Response** – The need for deed restriction or other remedy will be dependent on the results of the Eco Risk Assessment and the Human health Risk Assessment. The Navy does not see a need to speculate on the final remedy at this time. **RIDEM Comment** – **RIDEM is not and cannot**

speculate on a final remedy for this site at this time, but rather is attempting to bring to the Navy's attention that at decision time RIDEM will be focusing on the residential scenario (not the commercial/industrial scenario) to determine whether any remedial actions are warranted or not due to the present and future use of this portion of the site. The original statement and this response seem to indicate the Navy will focus on the commercial/industrial scenario and only minimally address the current use of this land. *(Please note the commercial/industrial scenario is acceptable for the property beyond that of the Yacht Club and the evaluation of the residential scenario is acceptable to determine whether residential deed restrictions are appropriate or not.)*

2. **RIDEM Comment 4 - Page 4-2, Section 4.4, Drilling and Subsurface Soil Sampling, Paragraph 3** – This paragraph states that no soil samples will be collected for laboratory analysis. Please explain the rationale for this. The results of the soil sampling (VOC, SVOC, PCBs, pesticides, and metals) could help us understand the contamination in the groundwater (source could also be in the soil). **Navy Response** – With regard to the soil sampling portion of this comment, please refer to the response to EPA Specific Comment No. 8. The EPA response notes that soil samples will be collected from 5 of the planned “deep” wells (MIP locations MIP16-08, S01, S03, S05, & S17) as well as at MIP16-S21 from the 20-22 ft bg and 32-34 ft bg intervals. **RIDEM Comment** – The Remedial Investigation is intended to be a full characterization of the site. Soil must be evaluated in order to fully characterize this Installation Restoration Site and in order to perform the appropriate risk analyses. This response seems to indicate that subsurface soils will be minimally evaluated. In addition to the subsurface soils, surface soils must also be evaluated (particularly in the areas of Buildings 41 and E-107). Referring to the original Navy statement in the comment above, RIDEM will require sufficient justification that surface soils meet the appropriate criteria even if we “evaluate a residential scenario just to assess the potential for unrestricted transfer of the property”. Therefore, RIDEM requests that the work plan be modified to appropriately evaluate both surface and sub-surface soils.
3. **RIDEM Comment 5 - Page 4-3, Section 4.4.1, Soil Boring and Sampling, Paragraph 1, Sentence 3** – The calibration of the PID should be checked at the end of the day to document that readings taken after lunch are also accurate. Please revise the work plan accordingly. **Navy Response** – Acceptable. **RIDEM Comment** – While the navy response is acceptable please state if re-samples will be taken if the PID is found to be out of calibration.

RIDEM would like to thank you for the opportunity to comment on this work plan. 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', written in a cursive style.

Richard Gottlieb, P.E.
Principal Engineer

Cc: C. Williams, EPA Region 1
W. Davis, CSO NCBC
H. Cohen, RIEDC
S. Licardi, ToNK
J. Shultz, EA Eng.