



United States Environmental Protection Agency
One Congress Street, Suite 1100 (HBT)
Boston, MA 02114-2023

December 7, 2000

Mr. John Mayhew
DoN, Northern Division - NAVFAC
10 Industrial Highway
Code 1811/EK - Mail Stop 82
Lester, PA 19113-2090

Re: Draft Site 16 (Creosote Dip Tank and Fire Fighting Training Area) Remedial Investigation Work Plan Addendum Navy Response to Comments, dated November 2000, at the former Naval Construction Battalion Center (NCBC) Davisville, RI

Dear Mr. Mayhew:

Pursuant to § 7.6 of the Davisville Naval Construction Battalion Center Federal Facility Agreement dated March 23, 1992, as amended (FFA), the Environmental Protection Agency has reviewed the subject document and our comments are enclosed to clarify the final work plan.

On November 15, 2000, I had sent a letter to you under § 7.9 of the Davisville Naval Construction Battalion Center Federal Facility Agreement dated March 23, 1992, as amended (FFA), regarding the need for soil sampling to start the investigation into nature and extent of surface and sub-surface soil contamination surrounding building 41. The final work plan addendum was received on November 29, 2000. No surface soil sampling and very limited sub-surface soil sampling was included in the work plan. The Navy has an obligation to perform sufficient soil sampling at this suspected source area in order to adequately perform the risk assessment for the site. Please respond to this letter with your plan to investigate the soils at building 41 and with your response to the enclosed comments.

If you have any questions with regard to this letter, please contact me at (617) 918-1384.

Sincerely,

A handwritten signature in cursive script that reads "Christine A.P. Williams".

Christine A.P. Williams
Remedial Project Manager
Federal Facilities Superfund Section

Enclosure

cc:

Richard Gottlieb, RIDEM

Walter Davis, CSO

Marilyn Cohen, ToNK

Howard Cohen, RIEDC

Anne Heffron, Enviro-Tech

Dinalyn Spears-Audette, Narragansett Tribe

Eileen Curry, Gannett Fleming

Jim Shultz, EA Engineering, Science and Technology

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EPA GENERAL COMMENTS

- Comment 3.** The response adequately addressed this comment. However, according to the final work plan the initial number of MIP locations selected was 21 and, based upon data from the initial MIP screening, the number of MIP locations was increased to 31. According to the response, the Navy began with 22 MIP locations of the 30 planned MIP locations. The discrepancy in numbers between the work plan and the response should be corrected or clarified, as appropriate.
- Comment 5.** Although a copy of the one-page 'Operating and Maintenance Instructions for Detrex Degreasers' was provided to EPA and RIDEM, it was not included in the revised work plan addendum.

EPA SPECIFIC COMMENTS

- Comment 4.** The response does not adequately address this comment. The EPA comment suggests that the area directly east and southeast of Building 41 will require additional seismic coverage prior to additional groundwater explorations to chase the groundwater contamination indicated by MIP data recently received by EPA. Although 3 MIP locations were added further south of the offsite study area, justification was not provided to explain why additional seismic coverage was not provided in that area. EPA may request additional seismic coverage depending on the results of this investigation.
- Comment 7.** The response does not adequately address this comment. The response indicates that samples were collected from eight soil borings for dioxin as described in the Work Plan (March 2000), but does not provide a methodology for collecting soil samples for dioxin analysis. The paragraph should also reference Table 9-1.
- Comment 11** The response does not adequately address this comment. The reasons why fluid conductive and/or EM conductivity will not be performed is not included in the Final Work Plan Addendum or the SOP provided by Geophysical Applications, Inc.
- Comment 17** The response adequately addressed this comment. However, Section 9 of Appendix A references Table 9-2 in the Final Work Plan Addendum which does not exist.
- Comment 19** The response states that "Tables 9-1 and 9-1 have been added to the QAPP Addendum". The first Table 9-1 references Table 9-1 in a former EA Work Plan

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(1999). This table should have been included in the Work Plan Addendum for clarity.

Comment 20 The response adequately addressed this comment with the addition of Tables 12-1 and 12-2. However, footnotes should have been included in the tables to describe the units ng/kg and pg/L.

Comment 22 The response to this comment cannot be evaluated until the soils data has been reviewed. Please provide the soils data and the associated QA/QC packages