



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-831-5508

3 December 2001

Mr. Ed Boyle, Remedial Project Manager
US Department of the Navy
Engineering Field Activity Northeast
Naval Facilities Engineering Command
10 Industrial Highway
Lester, PA 19113-2090

RE: Phase I Remedial Investigation Report
IR Program Site 16
(Former Creosote Dip Tank and Fire Fighting Training Area)
Naval Construction Battalion Center
Davisville, Rhode Island
Submitted 23 October 2001, Dated 22 October 2001

Dear Mr. Boyle,

The Rhode Island Department of Environmental Management, Office of Waste Management (RIDEM) has reviewed the above referenced document and has the following comments to offer:

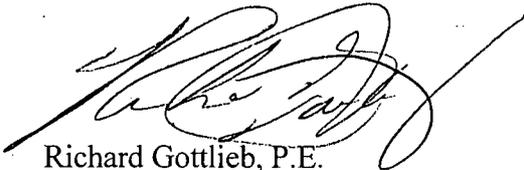
1. Table 4-2, VOC Detected in Soil Samples - For Wells MW16-07S, MW16-07 dup., MW16-14D, and SB16-28 the detection limit for 1,1,-Dichloroethene and Vinyl Chloride are above the RIDEM residential direct exposure criteria. The Navy will need to resample to determine if there is an exceedance of these compounds at these locations. This could determine whether a residential deed restriction is required at these locations or some form of remediation is required.
2. General Comment - Deep groundwater wells MW16-04D and MW16-05D have total CVOC concentrations of 567 and 2308 ug/l, respectively. MW16-28D also has a CVOC concentration of 120 ug/l. All these wells are within 200 feet of Allen Harbor and represent the closest groundwater well locations to Allen Harbor. Based on these results it will need to be determined if contamination has entered Allen Harbor from this plume.

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3. General Comment – The groundwater under IR Site 16 is classified as GB. Allen Harbor is classified as SA. When dealing with sediments, RIDEM uses the GA Leachability criteria, not the Residential Direct Exposure Criteria. Section 4.6.2 states RIDEM Direct Exposure Criteria are used for comparative purposes. Please revise accordingly.
4. Section 5.7, Human Health Risk Assessment – The Navy utilized the Method 1 criteria of the RIDEM Site Remediation Regulations (amended 1996) to evaluate risks in the various media associated with this site. The Navy has concluded that there are no concerns for site soil and seep water. RIDEM disagrees with this conclusion. Various PAH compounds and metals are in exceedance of RIDEM Residential Exposure Criteria for both the soil and sediment samples. Therefore, RIDEM will require some form of remediation. Please note that many of the exceedances are in the marina area which is considered recreational in nature and therefore subject to the RIDEM Residential Direct Exposure Criteria.

RIDEM looks forward to working with the Navy and USEPA on the completion of studies at this site. If you have any questions or require additional information please call me at (401) 222-2797 ext. 7138 or e-mail me at rgottlie@dem.state.ri.us.

Sincerely,



Richard Gottlieb, P.E.
Principal Engineer

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