



RHODE ISLAND  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-831-5508

4 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 – Clarification of Comment #4  
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;

It has come to the attention of The Rhode Island Department of Environmental Management, Office of Waste Management (RIDEM) that clarification of comment #4 for the above referenced document is needed. The original comment was submitted on 3 December 2001. The original comment is presented below:

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.

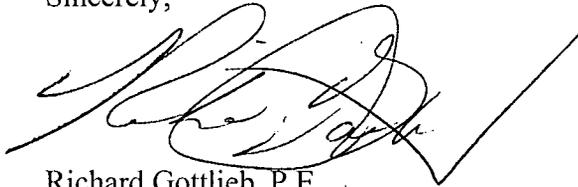
Clarification – RIDEM Site Remediation Regulations (amended 1996) Method 3 Objectives allows for a site specific risk assessment to be conducted by the responsible party. The site specific risk assessment conducted for this study was based on USEPA

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methods which has many parameters which are not as stringent as RIDEM parameters. As a result, the risks tend to be understated from RIDEM's point of view. Therefore, RIDEM cannot accept this analysis as being in compliance with Method 3 Objectives. In lieu of this, RIDEM defaults to its Method 1 criteria for determining if a human health risk exists at the site. Method 1 criteria are standards for various contaminants of concern set for the various media. Based on the sampling done for this study there are exceedances of Method 1 criteria indicating that a human health risk exists at this site. As noted above, RIDEM will require some form of remediation or the responsible party may repeat the Method 3 analysis to conform to RIDEM criteria .

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](mailto:rgottlie@dem.state.ri.us).

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard Gottlieb', written over a horizontal line.

Richard Gottlieb, P.E.  
Principal Engineer

Cc: M. DeStefano, DEM OWM  
C. Williams, EPA Region 1  
D. Barney, CSO NCBC  
H. Cohen, RIEDC  
S. Licardi, ToNK  
J. Shultz, EA Eng.