

**NAVY'S RESPONSES TO RIDEM'S COMMENTS
 ON THE SITE 16 DRAFT PHASE II RI QAPP**

GENERAL COMMENTS

Comment 1: Page 2-7 of 2-16, Section 2.1, Introduction, Bullet 3 – This bullet states that only two soil samples will be taken from well location MW16-07. It is recognized that numerous soil samples were taken in the EBS28 area of the site, however, since that initial investigation the horizontal boundaries have significantly expanded. In order to have a full characterization of the site additional surface soil samples will be needed to demonstrate whether human health or ecological risks are present. In addition, if the Navy is proposing natural attenuation as an alternative, as noted in this section, additional soil samples will be needed to demonstrate its viability. Please revise the document accordingly

Response — The Navy will collect soil samples from the two depth intervals from each of three soil borings to be located in the immediate vicinity of MW-16-07. These samples will be collected along with the soil samples to be included in a Site 16 Phase II RI QAPP Addendum. Locations for additional samples will be evaluated during preparation of a Site 16 Phase II RI QAPP Addendum and will include review of the soil sampling headspace vapor FID screening results recorded on the Phase II RI boring logs.

Comment 2: Page 5-1 of 5-6, Section 5.1, Project Planning Meetings, Paragraph 1, Sentence 2 – Please change “bi-monthly BCT meeting” to “quarterly BCT meeting” as they are typically held when we have RAB meetings which are now held quarterly.

Response — “Bi-monthly BCT meeting” will be changed to “quarterly BCT meeting.”

Comment 3: Page 5-4 of 5-6, Section 5.2.2, Phase I Remedial Investigation (Nature and Extent of Contamination in Soil), Sentence 4 – This sentence states that based on the human health risk assessment (HHRA) the soil was found to not pose unacceptable risk to human health. Please add the following statement: “Based on RIDEM Remediation Regulations, Method 1 the soils have been found to pose a risk to human health in the marina area. In addition, surface soils have not been examined in the expanded study area therefore, human health risk cannot be ascertained at this time.”

Response — The Navy will address RIDEM’s concerns using RIDEM’s Method 3 criteria, where they are more stringent than EPA’s, during preparation of the Phase II RI human health risk assessment (HHRA). The QAPP text will be revised as follows: “Based on the Phase I RI HHRA that used CERCLA

risk assessment guidance, the soil in the Stage 1 Area was found to not pose unacceptable risk to human health.”

Comment 4: Page 5-6 of 5-6, Section 5.2.2.1, Results of Human Health Risk Assessment, Sentence 5 – This sentence notes that with the exception of groundwater all other media posed no risk to human health. Please revise this paragraph to be consistent with Comment 3, above.

Response — The paragraph will be revised to be consistent with the response to Comment 3.

Comment 5: Page 15-1 of 15-3, Section 15.2, Field Data Reporting, Paragraph 2, Last Sentence – It is noted that EA will maintain and retain field records. The Navy, at minimum, should be given a copy of those records.

Response — The following will be added: The Navy will be provided copies of the field notebooks.

Comment 6: Table 7-1, Achievable Laboratory Limits (QLs) - beginning on Page 7-3, please explain what the * is attempting to indicate. No legend has been provided.

Response — Page 1 of Table 7-1 includes the table’s ‘Notes’; however, the ‘*’ is used only in the ‘Metals Inductively Coupled Plasma’ portion of this table on pages 3 and 4 and has been defined in that section title as ‘* indicates ICP MS.’