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Ms. Christine Williams  
U.S. Environmental Protection Agency, Region I  
1 Congress Street Suite 1100 (HBT)  
Boston, MA 02114-2023

SUBJECT: DRAFT FINAL PHASE III QUALITY ASSURANCE PROJECT PLAN  
(QAPP) FOR INSTALLATION RESTORATION PROGRAM (IR) SITE  
16, FORMER NAVAL CONSTRUCTION BATTALION CENTER (NCBC)  
DAVISVILLE, RI

Dear Ms. Williams:

This letter is in response to EPA Region I letters of 03 May 2007 and 10 May 2007 concerning the Site 16 Phase III Remedial Investigation.

The Navy has evaluated the comments submitted based on the EPA's review of the Draft Final Phase III Quality Assurance Project Plan (QAPP) for Installation Restoration (IR) Program for Site 16 (March 30, 2007), Transmittal of Notes From Feb 14 Conference Call, Navy Responses to E-mails and Memoranda Submitted by EPA to Support the 2/14/07 Conference Call, and Navy Responses to February 2007 EPA Follow-Up Comments on Phase III RI QAPP for Site 16.

The majority of EPA comments address the proposed hydrogeological investigation and reflects the EPA's position that the investigative approach presented in the QAPP will not adequately assess the quality of groundwater migrating onto the Site 16 area. The concerns presented in the comments and in the text of the e-mail of May 10, 2007 distributing the comments appear to be based primarily on the EPA's assumption that the Navy will rely solely on "direct push technology (DPT)" to investigate groundwater quality immediately upgradient of Site 16. A review of the QAPP and Enclosure 6 (Navy Plan for Investigations in the Site 16 Upgradient Area) of Navy correspondence dated 23 March 2007 indicates this is not the case. Rather, the use of DPT to collect soils and groundwater samples in the upgradient area is one step in a multi-step plan that will be used by the Navy to evaluate groundwater quality in the upgradient area. This multi-step approach had also been discussed at length with the EPA on February 14, 2007, as documented in the Transmittal Notes from that phone conference. As described in the QAPP and Enclosure 6, the plan includes:

**Step 1** - The reprocessing of existing geophysical data and the possible collection of new geophysics data (seismic refraction tomography) in the upgradient area.

**Step 2** - The review of new potentiometric surface maps based on water level measurements collected during the joint United States Army Corp of Engineers (USACE)/Navy field event conducted in May 2007.

**Step 3** - The use of DPT to collect both soils and groundwater samples from six locations in the immediate upgradient area (along Thompson Road). Five of the six borings will be advanced to bedrock, if possible.

**Step 4** - A review of all data collected in Steps 1 through 3. Three new monitoring wells will then be installed in overburden or bedrock immediately upgradient of Site 16 at locations and depths that are selected in consultation with the EPA Region I and Rhode Island Department of Environmental Management (RIDEM).

**Step 5** - A review of all geological and analytical information gathered during well installation and sampling in consultation with EPA Region I and RIDEM to determine if any additional investigative work is necessary to assess groundwater quality (overburden and/or bedrock) in the area immediately upgradient of Site 16.

The exact locations and screened intervals for the three permanent monitoring wells are not specified in the Phase III QAPP because the locations and screened intervals will be based on the new geophysics data, the results of the DPT investigation (for both soils and groundwater), and groundwater flow patterns from the May 15-16 synoptic site-wide event.

The DPT investigation will provide significant, useful soil and groundwater data in a cost effective manner. The DPT work will result in the installation of six monitoring wells (mini-wells) in the overburden, which will be helpful in providing information regarding groundwater flow patterns in the upgradient area along Thompson Road where little hydrogeological data is currently available. The Navy recognizes there are some limitations to a DPT investigation. While the EPA is correct that the DPT investigation alone may not result in an adequate understanding of upgradient conditions, the information available as a result of the investigation will be used to optimize the placement and screening of permanent wells such that the potential for contaminant migration onto Site 16 is understood. Also, as noted above, additional permanent monitoring wells may be installed as per the multi-step upgradient investigation if it is determined that more work is needed to characterize upgradient groundwater conditions at Site 16.

Additionally, the Navy expects to utilize the data gained from the recent geophysics investigation accomplished by USGS in early May 2007 (through coordination by EPA).

The Navy is confident that this multi-step approach will be successful. It does not presume in advance where upgradient wells should be located or rely on one particular technology or approach to understand the upgradient area; rather, placement of the wells will be based on multiple lines of evidence gathered during the investigation (i.e., new geophysics, new groundwater flow information, and new VOC data for soils and groundwater in the overburden) with BCT involvement. The Navy looks forward to working with all BCT members on this issue.

The EPA's pre-determined position that the plan will not garner the data needed to adequately characterize upgradient conditions seems premature. Consequently, the Navy is proceeding with the implementation of the Phase III QAPP for Site 16 and looks forward to successful resolution of this issue with EPA and RIDEM as the environmental data become available.

If you have any questions, please do not hesitate to contact the Remedial Project Manager, Mr. Curt Frye, at 215-897-4914.

Sincerely,



David Barney  
BRAC Environmental Coordinator  
By direction of BRAC PMO

Copy to:

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