



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NEW ENGLAND - REGION I
1 CONGRESS STREET, SUITE 1100 (HBT)
BOSTON, MASSACHUSETTS 02114-2023

May 7, 2007

N62578.AR.002235

NCBC DAVISVILLE

5090.3a

Curtis Frye

Dept of the Navy, BRAC PMO Northeast

Code 5090 BPMO NE/CF

4911 South Broad St

Philadelphia, PA 19112-1303

Re: Letter from Steven King, QDC, in regards to: *Stage I of the Phase III Quality Assurance Project Plan for Installation Restoration Program site 16*, dated April 24, 2007, for the former Davisville Naval Construction Battalion Center, North Kingstown, RI

Dear Mr. Frye:

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 comments are below.

1. The work noted in the subject letter could be described as "general site work" in accordance with 29 CFR 1910.120 and as such may be subject to these regulations along with other construction standards.
2. Work on the NCBC NPL site 16 (OU9) must be conducted in accordance with the FFA and site specific HASP.
3. No ROD has been signed for this operable unit and therefore no decision as to the contaminant levels has been made. Very few surface or subsurface soil samples have been analyzed in this general area. However, since the Navy has used this area for laydown purposes and as a rail yard and contamination is to be expected.
4. EPA has review much more groundwater data for this area. The groundwater is contaminated with high levels of volatile organics and therefore the Navy should ensure worker protection if subsurface work is to be performed.
5. Monitoring wells necessary for the characterization of the OU seem to be within the work area. Wells must be protected and not be compromised. The following well locations seem to be affected by this work: locations 9, 10, 11, 12, 14, 17, 19, 21, 22, 24, 25, 31, 32, 33, 34, 35, 36, 37, 38, 59, 60, 61, 63, 64, 65, 67, 69, 70, 71, and PGU-Z4-03. This is a total of 30 clusters, or close to 100 wells that will have

to be protected from damage. The Navy may want to properly abandon the effected wells and re-install them (in the same or more suitable locations) after the rail yard project is completed. EPA does not believe it would be reasonable to allow the project to go ahead expecting wells to be compromised. The Navy has a responsibility to ensure the wells are not compromised. EPA believes proper abandonment and re-installation should be budgeted for. The Navy neglected to ensure the protection of the wells at the building 224 demolition and is in violation of the FFA at OU7 for this issue.

6. Please provide additional project information and schedule.
7. Please respond to these comments in writing.

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

Sincerely,

Christine A.P. Williams, RPM
Federal Facilities Superfund Section

cc:

Brian Balukonis, RIDEM
Johnathan Reiner, ToNK
Steven King, QDC
Rick Sugatt, EPA (via e-mail only)
Peter Golonka, Gannett Fleming (via e-mail only)
Lee Ann Sinagoga, Tetra Tech NUS, Inc (via e-mail only)