



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

N62578.AR.002259
NCBC DAVISVILLE
5090.3a

April 27, 2009

Curtis Frye
Dept of the Navy, BRAC PMO Northeast
Code 5090 BPMO NE/CF
4911 South Broad St
Philadelphia, PA 19112-1303

Re: Draft Final Phase III RI Report for OU9 (Creosote Dip Tank, Fire Fighting Training Area and former Bldg 41 Area (site 16)), and Navy responses to EPA follow up comments dated March 27, 2009, at the former Davisville Naval Construction Battalion Center (NCBC), North Kingstown, RI

Dear Mr. Frye:

Pursuant to § 7.6 of the Davisville Naval Construction Battalion Center (NCBC) Federal Facility Agreement dated March 23, 1992, as amended (FFA), the United States Environmental Protection Agency (EPA) has reviewed the subject document, comments are below.

Navy has no recommendations for SB16 A3-12. This location had elevated PAH and Navy had not included this data in the HHRA. The FS also didn't include alternatives to remediate this area. The site 16 RI/FS cannot be finalized without determining the nature and extent of this contamination and determination of what, if any, remediation is needed.

Navy also has no recommendations for SB16-A2-05. This location had a fuel odor and elevated PAH concentration. The FS also didn't include alternatives to remediate this area. The site 16 RI/FS cannot be finalized without determining the nature and extent of this contamination and determination of what, if any, remediation is needed.

Navy has no recommendations for investigating soil below the depth the direct push drill rig could get to. There is a portion of the site soil above bedrock that has not been investigated in several areas. This issue is important to the FS and remedial design to target deep overburden contamination during remediation.

The soil gas sampling is only 1 line of evidence EPA uses to determine if there is a risk from soil or groundwater contamination to the indoor air. To determine if there is an indoor air issue at the currently occupied commercial or recreational buildings, the navy will have to follow the EPA guidance, <http://www.epa.gov/osw/hazard/correctiveaction/eis/vapor.htm> . Please add this recommendation for required

work prior to finalization of the RI/FS for site 16. Please see additional comments in the OU9 (site 16) FS Comment Package. EPA cannot accept the proposed vapor intrusion cleanup value based solely on the J&E model. The finalization of our review of the Johnson and Ettinger results should be deferred until we have come to some agreement on the FS.

EPA appreciates the Navy's other recommendations for work to be performed during the FS, as we are not entirely satisfied with the RI as it now stands. Please provide the work plan for our review.

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:

- Richard Gottlieb, RIDEM
- Johnathan Reiner, ToNK
- Steven King, RIEDC
- Dave Barney, BEC (via e-mail only)
- Bill Brandon, EPA (via e-mail only)
- Steve DiMattei, EPA (via e-mail only)
- Rick Sugatt, EPA (via e-mail only)
- Kathleen Campbell, CDW (via e-mail only)
- Conrad Leszkiewicz, CDW (via e-mail only)
- Lee Ann Sinagoga, Tetra Tech NUS, Inc (via e-mail only)