



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

Department of Environmental Management  
DIVISION OF SITE REMEDIATION  
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U.S. Department of the Navy  
Northern Division  
Naval Facilities Engineering Command  
10 Industrial Highway  
Code 1823-Mail Stop 82  
Lester, PA 19113-2090

RE: Navy's Response to RIDEM Comments on Derecktor Shipyard Site Assessment  
Screening Evaluation Report, Naval Education and Training Center, Newport, Rhode  
Island

The Office has received the Navy's response to comments on the Site Assessment Screening Evaluation Report for the Derecktor Shipyard Site. This Office has evaluated the Navy's response and has determined that certain responses require clarification. Attached are responses to comments which require additional attention. Due to the large number of outstanding issues and the need for the Navy to perform site visits in order to address these concerns, the State request that Navy address these issues before submitting the draft final document. If the Navy has any questions concerning the above, please contact this Office at (401) 277-2797.

Sincerely,

Paul Kulpa, Project Manager  
Division of Site Remediation

cc: Warren S. Angell, DEM DSR  
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**Evaluation of Navy's Response to Comments on Draft  
Site Assessment Screening Evaluation Report  
Derecktor Shipyard, NETC**

**1. General Comment**

The report is organized such that each section deals with a particular aspect of the investigation for all of the areas of the site. That is, one section deals with sumps for the entire site, the next deals with drainage, etc. This layout does provide the reviewer with an overall picture of conditions at the site. However, this format is not as well suited for examining individual portions of the site, ie individual buildings or areas. Therefore, an additional section should be added to the report which compiles all of the information for an individual area or building from the different investigations conducted at the site. The following information should be included in this section of the report; historic information, all of the findings and specific recommendations of the PA, the results of any removal actions conducted prior to the SASE, the findings from the sump, drywells, drainage system, test pitting, soil borings, monitoring wells, etc. The State recommends that this section follow the format used in the Preliminary Assessment.

*Evaluation of Response*

*The Navy has indicated that the report will not undergo a complete revision to be release specific. The Navy appears to have misinterpreted the Office's comment. The Office did not request a major rewrite or change in the format of the report. The Office requested that all the information for an individual area or building from the different investigations conducted at the site be included in one section of the report. As an illustration, for Building 6 the report would include a section which summarizes the historic findings for this building, potential areas of concern identified in the Preliminary Assessment, and during the SASE and measures taken to remediated or investigate these areas and the results there of. This section would simply compile all pertinent information for that area. Site conditions warrant that this section address individual buildings and sections of the site separately. Please revised the report accordingly.*

**3. General Comment**

The report should include a detailed discussion of the history of the site. This discussion should include information from aerial photographs, historic plans, interviews, etc. for each area of concern or building. The State recommends that the format for the individual structures in the PA be expanded upon in this report.

*Evaluation of Response*

*The Navy indicated that additional work concerning this issue will not be performed. In addition, appropriate information from the PA will not be incorporated into the SASE. Preliminary Assessments are limited undertakenings and are not designed to examine a problem in the detail that a SASE would. Therefore, it would be inappropriate to rely solely on the work of the*

*PA and not perform the additional work normally associated with a SASE. Accordingly the Office reiterates its concern. The Navy should perform the additional work and incorporate the new findings with that of the PA into the SASE report.*

#### **4. General Comment**

This Office is aware that the remedial investigation was photodocumented. Pertinent photographs should be included in this report. These should include, photographs of sumps and catch basins before and after the removal of sludges or other debris, photographs of any staining or other visible signs of contamination, such as the paint discharge drains beneath Building 42, photographs showing the location of pertinent objects, such as the underground vaults adjacent to Building 42, etc, representative photographs of equipment boxes or other structures, appropriate photographs of test pits and so forth. A map should be provided which delineates the location of these photographs. In addition, pertinent photographs showing areas of concern from the Preliminary Assessment should also be included in the report.

#### *Evaluation of Response*

*The Office has received the photographs and video tapes. The States package included twenty four photographs. Please indicate whether this represents the total number of photographs taken at the site or whether additional photographs are available. The Navy has not addressed the second issue. Specifically pertinent photographs from the PA should be included in the SASE.*

#### **6. General Comment**

Please be advised that all UIC structures must either be permitted or properly closed. Permits are obtained through the UIC Section of the DEM. The requirements of the permit depend upon the use of the structure. Closure is through the UIC Section and Waste Management Section of DEM. Closure requirements are delineated below.

All UIC structures must be properly closed to eliminate the potential for the structure to act as a conduit for groundwater contamination in the future. The following steps must be followed during the closure of UICs, attached please find "UIC Facility Closure Guidelines":

- a. all liquid and/or sludge remaining in piping, drains, tanks, drywells, etc. must be removed;
- b. all drains, piping and appurtenances associated with the UIC disposal system must be sealed;
- c. after confirmatory samples have demonstrated the absence of contaminants within the disposal system, the system must be cleaned fill and capped to grade (confirmatory analytical results must be submitted to the Department prior to

backfilling);

*The response note that other discharge points will be blocked or dismantled as part of this program. It is assumed that this refers to structures which have soft bottoms or other avenues for a release to the environment. Please be advise that this action require regulatory involvement. Accordingly, said actions cannot occur until approval is obtained from the DEM.*

## **7. General Comment**

The human health and ecological risk assessment assumes that current conditions are maintained at the site, surface coverage, etc. This is not necessarily the case and the report should note this or be modified accordingly.

### *Evaluation of Response*

*The Navy indicated that the report will be modified as follows; The human health risk assessment was conducted based on current conditions at the site, particularly regarding the location and extent of exposed surface soil levels.....*

*The following should be added to the above. As an illustration, residential use of the property may increase the area of exposed surface soils. This additional exposure was not evaluated in the risk assessment. Therefore the risk reported in this document with regards to this scenario may not represent the risk that would have been reported if an increase in exposed surface soils was assumed.*

## **8. Section 1-1, Projection Objectives; Page 1-2, Paragraph 2.**

The discussion in this section is limited to the four areas of concern. The report should note that Derektor Shipyard occupies space currently used by NUWC. This section of the report should also briefly state why these areas were not included in the current investigation and state any remediations carried out at these sites. A more detailed discussion of these areas should also be included in the appropriate section of the report.

### *Evaluation of Response*

*The Navy indicated that the areas of concern outside those currently defined in the SASE are limited to underground storage tanks. The Preliminary Assessment identified other ares of concern in addition to underground storage tanks. It is the State's understanding that all areas of potential concern were addressed during the rehab of these buildings. Therefore, there was no need to investigate these areas under the current study. The State is requesting that the Navy document this effort. Accordingly, the report should discuss all actions conducted at these locations, (investigation of drainage system, potential areas of surface discharge, actions under the UST program, etc.). This information is needed in order to determine whether additional work is required in these areas. Please be advised that upon receipt of said documentation, the State will conduct an inspection of the areas in question.*

**10. Section 2.4, Findings of the Preliminary Assessment;  
Page 2-5, Whole Section.**

As indicated in the report, the Preliminary Assessment (PA) was used to identify potential areas of concern. These areas would then be addressed in the SASE Report. The PA noted that a number of storm drains existed in the vicinity of Buildings 1,2,3 & 4. The report also notes that the drains in the vicinity of building four may have been impacted by releases from the site. The report should include a discussion of these buildings and any work performed in these areas during the SASE. Please be advised that the storm drains are potential UIC and should have been investigated as part of this SASE. This should be noted in the report.

*Evaluation of Response*

*The Navy has noted that the potential impacts from the above areas are limited to discharges to the bay or were defined to be of low priority in the Preliminary Assessment. The Office has never approved the Preliminary Assessment or the findings or recommendations there in. Therefore, the statement that these areas were not included in the SASE, was based upon the recommendations of the Preliminary Assessment is incorrect. As stated above, these areas were not included in this study due to the fact that the Navy indicated that the areas of concern had been addressed.*

*The Navy also indicated that, as stated in the Preliminary Assessment, any discharge from drains in this area would have entered into the bay. Throughout the Preliminary Assessment probable discharge points from the drains was thought to be the bay. Therefore, if the findings of the Preliminary Assessment were sufficient to determine that additional work was not required for the drains located outside of the SASE study area, the report should state why the Navy invest time and money to determine the discharge points for the drains within the study area. The State reiterates the comment and request that the Navy address these issues.*

**12. Section 2.5, Recent Activity;  
Page 2-6, Whole Section.**

Building 42 was used as a hazardous waste storage area and as a paint facility. During the shipyards operational period hundreds of fifty five gallon drums containing waste solvents, oils, acids and other materials were located in this building. The floors of the buildings were heavily stained and or flooded. The report should include a description of this building in the individual site history section.

*Evaluation of Response*

*As previously indicated a detailed discussion of historic conditions at this location must be included in the report.*

**13. Section 2.5, Recent Activity;  
Page 2-6, Whole Section.**

On the southeast corner of Building 234 was a hazardous waste storage area. The EPA required that soil and groundwater samples be collected in this area. The report should note that this area was used to store hazardous materials and that it was investigated under the USEPA RCRA program. Since the EPA investigation was limited to EP Tox analysis the report should note whether any remedial investigation activities, (test pits, boring etc) under the current SASE program addressed this area. Finally the location of this area should be depicted on a map.

*Evaluation of Response*

*As previously indicated a detailed discussion of historic conditions at this location must be included in the report. In addition, this Office requested that the Navy supply a copy of the original map of the EPA action and note on a figure the location of this action. This information is necessary to determine whether the sample locations in question were properly placed.*

**14. Section 2.5, Recent Activity;  
Page 2-6, Whole Section.**

On the northern corner of Building 234 there was a spill of fuel oil. The oil from the spill entered a storm drain in the area. This information should be included in the report. The report should also note whether any contamination was observed in the storm drain in which the fuel entered and whether this drain had a soft or hard bottom.

*Evaluation of Response*

*As previously indicated a detailed discussion of historic conditions at this location must be included in the report. In addition, it is assumed that the report will note whether any residue contamination was found in this area.*

**15. Section 2.5, Recent Activity;  
Page 2-6, Whole Section.**

The northern water front area was used to store hazardous waste. The waste were stored in fifty five gallon drums and in tanks without secondary containment or protection from the elements. As a result there were reports of releases of hazardous material from the corroded drums. Accordingly, EPA required an investigation of this area. The report should include a detailed discussion of the north water front area and the investigation required by the EPA. In addition, since the EPA investigation was limited to EP Tox, the reports should note what samples from the SASE were taken from the areas investigated by the EPA. A map should be provided which depicts the sampling locations of the EPA and those of the SASE.

### *Evaluation of Response*

*The Navy has indicated that the exact location of the samples in question is not available, therefore the Navy is unable to comply with the Office request to depict the historic sampling locations in question on a map with the current sample locations. The 1984 study includes two figure drawn to scale depicting the sampling locations, therefore, it is possible to address this Office's request. The Office reiterates it request that the Navy provide a copy of the original drawing and transpose the requested information onto a map.*

**16. Section 2.6, Recommendations of the Preliminary Assessment Report;  
Page 2-8, Paragraph 2.**

This section of the report deals with the sand blast grit found at the site. As previously discussed, the report should include all of the appropriate estimates, removal volumes and analytical results for this action. The report should note whether any grit still exist at the site. Please note that after the completion of the removal action, grit was discovered in the vicinity of the piers.

*The Office indicated that after the removal action sand blast grit was found at the site. To illustrate this point this Office noted one location where grit was present; grit is present at other locations scattered across the site. Therefore, this Office reiterates its comment concerning sand blast grit at the site.*

**19. Section 2.6, Recommendations of the Preliminary Assessment Report;  
Page 2-10, Paragraph 4.**

This section of the report alludes to the ASTs found at the site. The discussion of the AST should be elaborated to include the following; a map depicting the location of each AST, the type and size of AST, the contents of the AST when it was dismantled, the presence of any staining associated with the AST, SASE sampling associated with the ASTs, and any other pertinent information.

### *Evaluation of Response*

*The Navy has indicated that additional information will be provided concerning these ASTs. This additional information should include appropriate maps depicting the location of the ASTs and current sampling locations. Be advised that photocopies of any original maps should also be submitted to this Office.*

**23. Section 3.2, Drainage Systems and Outfalls;  
Page 3-4, Whole Section.**

This section of the report discusses the measures taken to investigate the storm drains in the area. The report has not indicated whether each storm drain was tested to determine whether it was a UIC, and whether a release had occurred. The report should delineate the measures taken to determine whether a storm drain was a UIC, and note on a map which drains had under gone testing and the results of this effort.

### *Evaluation of Response*

*The report notes that the majority of the catch basins at the site had consolidated bottoms and therefore were not UICs. Please be advised that in order for a catch basin not to be a UIC the bottoms and side must prohibit migration into the surrounding soils. The report should therefore note what procedures were employed to determine if the catch basins or other structures met this criteria.*

**25. Section 3.4.3, Groundwater Monitoring Well Installation;  
Page 3-11, Whole Section.**

At a number of sites, the location of the monitoring wells will not provide the necessary information to determine the subsurface disposal systems impact to groundwater. Many of the wells appear to be side gradient to the buildings where the systems are located and borings were not advanced at these locations. Please refer to analytical testing results from S-234-4, S-42-1 and S-42-2. The report should comment on the location of the monitoring wells and note at which locations additional wells are needed.

### *Evaluation of Response*

*The Navy has indicated that it is not possible to locate monitoring wells due to the presence of buildings, proximity of the ocean and the sheet piling. Building 234 is an open slab and therefore should not present logistical problems for installing a well. In addition, the Navy has installed monitoring wells in close proximity to the ocean at other sites at this base. Therefore, the Navy should discuss the limitations of this practice and indicate whether the other similarly located wells on the base should be replaced. Finally, please indicate the limitations that sheet piling poses to the installation of monitoring wells.*

**26. Section 3.5.3, On-Shore Ecological Setting;  
Page 3-14, Whole Section.**

This section of the report deals with the ecological survey conducted at the site. Based upon the information presented it appears that the survey was limited to an onsite walkover and a literature search. During the Ecological Advisory Board Meeting it was the State's understanding that a more in depth survey was conducted at the site. For clarification, please provide a more detailed description of the ecological survey. This information should be submitted to the State prior to the issue of the draft final document as it will influence decisions concerning the ecological risk assessment methodology, specifically, whether the listed species in the report should be limited to those observed during the ecological survey.

### *Evaluation of Response*

*The Navy has indicated that a complete description of the Ecological survey is included in Attachment to these comments. The State's package did not include the referenced attachment. Please provide a copy of said attachment for review. Be advised that the Office will withhold response to this comment until said package is received.*

**29. Section 4.0, Finding of the Investigation ;  
Whole Section.**

Building # 6 was deemed to be an area of potential concern due to the activities conducted in the building. Specifically, hazardous chemicals were used in the building for pipe preparation work, hazardous chemicals were stored outside of the building, the loading dock, and pavement in the area was heavily stained, a discharge pipe was found which led from the hazardous materials tanks in the building to a discharge point outside of the building, and there were allegations that leaking PCB transformers were stored in the area. This section of the report does not adequately address this area. Specifically, the report should discuss the potential sources of contamination, the measures taken to investigate these source, (ie collection of samples from storm drains, surface soil sample groundwater sample, etc) and the results of this sampling effort. Note, as previously requested, this information will be in one section, (that is, surface soil, subsurface soil, drainage basin, sample, etc). The report should also note whether the drainage basins in the area had hard or soft bottoms.

*Evaluation of Response*

*The Navy responded to the Office's concerns with respect to the PCB release at this location. The Navy did not adequately respond to the other issues broached in this comment. The Office therefore reiterates its concern.*

**30. Section 4.0, Findings of the Investigations;  
Whole Section.**

Section three of the report notes that a number of the storm drains, sumps and other structures at the site were filled, contained sand blast grit, sludges and other debris which had to be removed. The condition of the individual structures should be noted in the report as well as any other pertinent information, presence of oil or other contaminants, etc.

*Evaluation of Response*

*The Navy's response involves a series of paragraphs which includes a general description of the findings. The Office requested that the report note the condition of each catch basin, and specifically whether contamination observed at the time of the Preliminary Assessment was still present.*

**31. Section 4.0, Findings of the Investigations;  
Whole Section.**

Huts 1 & 2 were used as a maintenance facility by Derecktor Shipyard. These Huts were considered to be an area of significant concern due to their use as a maintenance facility and the presence of fifty five gallon drums, heavy oil staining, reported leaks, evidence of leaks presence of small ASTs and large 20,000 and 10,000 gallon ASTs. The Division is aware that samples were collected to

address the concerns in this area. However, due to the structure of the report and the scale of the maps it is not possible to easily ascertain the specifics of the investigation. Therefore, the report should be modified so as to provide the following information;

Location of 20,000 and 10,000 gallon ASTs, leakage associated with said tanks, contents of tanks, fate of tanks, analytical samples taken to determine if a release had occurred at the tanks, location of various 250 gallon waste oil/gasoline ASTs, leakage associated with tanks and analytical tests to determine if a release had occurred, location of interior and exterior manholes, staining and contamination associated with each and tests to determine if a release had occurred.

#### *Evaluation of Response*

*Based upon the Navy's response it is assumed that the Office's issues will be addressed, in that a detailed description of the findings of this area including all appropriate maps, figures and photographs will be included in the report.*

#### **32. Section 4.0, Findings of the Investigations; Whole Section.**

During the Derecktor Shipyard operational period, two quonset huts were located north of Huts 1 & 2. Heavy staining was observed on the floor of these huts. The report should note the location of these huts, discuss potential historic contamination and its potential impacts, i.e. whether said contamination may have entered any storm drains, etc). The report should also note whether any remedial investigation activities were conducted as part of the SASE for these structures.

#### *Evaluation of Response*

*Based upon the Office's aforementioned concerns with the format of the report and the target areas it is assumed that the Navy will address this comment.*

#### **33. Section 4.0, Findings of the Investigations; Whole Section.**

The Preliminary Assessment noted that the south exterior wall of Building 42 was heavily stained. The report should note whether this condition still exists. Furthermore, the report should note what efforts were taken if any to determine if the soils adjacent to the southern wall were impacted and whether any sampling was performed in this area.

#### *Evaluation of Response*

*The Navy noted that stained soils or walls were not observed in the area and the opportunistic vegetation were present. The report should elaborate on these findings. Specifically, the report should note what procedures were employed to determine if the stained soils were present, and whether a release had occurred. At a minimum, the Office assumes that the Navy removed any vegetation which prohibited an adequate inspection of the area and collected subsurface*

soil samples for jar headspace analysis, field VOC, TPH and metal analysis (laboratory analysis would have to be performed for those analytes not subject to field analysis). The Office also requests a copy of the field notes taken during this investigation.

**35. Section 4.0, Findings of the Investigations;  
Whole Section.**

There are two separate reports of waste lagoons located at the northeast corner of Building 42. These lagoons apparently accepted oil waste from the shipyard. The potential existence of these lagoons was not noted in the report. The report should therefore be modified accordingly, and the potential location of the lagoons noted on a figure. The report should also note what remedial investigation activities were designed to ascertain the location of these lagoons (the location of the test pit or monitoring wells in this area may not have intercepted these lagoons). In addition, the report should clearly note that the absence of surface staining cannot be used as a criteria for the remedial investigation. This is due to the fact, that the Navy, despite agreements with the regulators not to, had placed clean fill in the area north of Building 42.

*Evaluation of Response*

*The Navy has not adequately addressed the Office's comment. Specifically, information was requested concerning samples taken with respect to these former lagoons. To address this concern this Office expects the Navy to include in this report all historic information concerning the location of these lagoons, ie historic site sketches, aerial photographs, etc.. The locations of the lagoons can then be placed on a map depicting sampling locations.*

**36. Section 4.0, Findings of the Investigations;  
Whole Section.**

The Preliminary Assessment notes that a pile of slag like material was found in the south east corner of Building 234. This material was stored near three storm drains. The report should include a discussion of this material. In addition the report should note what remedial investigation activities, storm drain samples, soil sample, etc, which were taken to investigate any releases from this material.

*Evaluation of Response*

*The Office requests a copy of any historic maps or reports and a current map depicting the location of the historic source and current sample locations. In addition, the report should include a detailed discussion concerning historic contamination and present conditions.*

**37. Section 4.0, Findings of the Investigations;  
Whole Section.**

The Preliminary Assessment noted that the shoreline near the southeastern corner of Building 234 was stained reddish brown, probably from rotoblast material. The report should note this and indicate whether the staining is still

present. The report should also indicate what remedial investigation activities were conducted in this area.

*Evaluation of Response*

*The Office requests a copy of any historic maps or reports and a current map depicting the location of the historic source and current sample locations. In addition, the report should include a detailed discussion concerning historic contamination and present conditions.*

**38. Section 4.0, Findings of the Investigations;  
Whole Section.**

The Preliminary Assessment notes that rotoblast grit and sandblast grit was found in several locations in the vicinity of Building 234. The SASE has not noted whether this material is still present at the site. The report should address this issue and note whether any samples were collected in areas of suspected concern.

*Evaluation of Response*

*"Remanent quantities of this material (less than several cubic feet scattered at various locations)..."*

*The Navy's response indicated that the volume of sandblast material was estimated during the SASE investigation. The Office assumes that the depth of the material in the areas in question were determined by hand auguring. Therefore, if this is the case the above should be modified as follows; Remanent quantities of this material (less than several cubic feet, as determined by hand auguring, were scattered at various locations)...The locations of these deposited and all associated sampling is depicted in Figure XXX*

**39. Section 4.0, Findings of the Investigations;  
Whole Section.**

The report notes that Building 18 was not considered an area of potential concern due to the historic use of the site. The Division is aware the building is in an area subject to erosion. The Preliminary Assessment noted that there were two 250 gallon storage tanks and several fifty five gallon drums on the site. The report should note whether these items had been removed from the buildings.

*Evaluation of Response*

*As previously stated, these areas were excluded from the investigation portion of this SASE based upon assurances that these areas had been remediated. This Office is requesting that the Navy document this process. Please be advised that during a recent inspection of this building, oil contaminated soil was found on the northern end of the structure. The volume of contaminated soil was not determined. This Office requests that the Navy determine the volume of said soils and ascertain whether a removal action is warranted.*

**40. Section 4.0, Findings of the Investigations;  
Whole Section.**

The report noted that samples were collected from the north waterfront area due to the potential concern from releases of hazardous materials stored in that area. The report should include a discussion of the sampling locations and the areas of potential concern, such as the location of the hazardous waste AST, location of sampling required by EPA to address historic releases., etc.

*Evaluation of Response*

*The Navy response is limited to Building 42, Building 243 is not discussed. In addition, please refer to this Office's evaluation of the Navy's response to Comment 25 concerning groundwater sampling.*

**46. Section 4.1.3, S42-5;  
Page 4-3, Paragraph 4.**

The report states that the "vault was pumped out" however the bottom of the vaults could not be closely examined due to the "presence of water and soil". The report should note whether water reentered the vault after it was pumped thereby prohibiting visual inspection of the floor, or whether it was logistically impossible to remove all of the water from the chamber.

*Evaluation of Response*

*The report notes that borings were employed to determine whether a release had occurred. Please be advised that, in the future, these structures should be investigated with test pits unless conditions dictate that other approaches are warranted, for example presence of chlorinated solvents warrants borings to bedrock,*

**48. Section 4.1.3, S42-5;  
Page 4-4, Paragraph 1.**

The report indicates that soil samples were collected from the vault. The report should indicate whether these samples were from the discussed top soil which fell in or whether they were collected from a different section of the tank.

*Evaluation of Response*

*The Navy response indicated that soil introduced into the vault when it was opened was sampled. The purpose in collecting samples from structures of this nature is to determine whether the sediments or sludges present there in are contaminated. The Office questions the utility of collecting soils that may have been recently introduced into the vault. This office requests that the vault be resampled to determine the contaminants of concern.*

**50. Section 4.1.4, Dry Well Huts 1 & 2;  
Page 4-4, Paragraph 6.**

This section of the report states that the compacted gravel bottom of the dry well did not allow for collection of soil samples. This necessitated the installation of boring down gradient from the dry well in order to determine whether a release had occurred. In order to avoid confusion, the report should note the logistic problem which prohibited boring inside of the dry well.

*Evaluation of Response*

*"because the weight of the rig this close to the dry well would cause the well to collapse. Therefore,..."*

*The following should be added to this section of the report*

*"because the weight of the rig this close to the dry well would cause the well to collapse. Therefore a sample was collected xxx feet downgradient of the dry well, and the depth of the sample was determined by the contaminants present in the well, that is the boring was advanced approximately five feet below the lowest position of the dry well, the lack of chlorinated solvents other sinkers indicated that a deep boring to bedrock was not warranted."*

**53. Section 4.1.8, Equipment Boxes, Building 234;  
Page 4-7, Whole Section.**

The information provided in the report indicates that all of the equipment boxes were not tested. Please be advised that this Office does not concur with the methodology of sampling only a number of the subfloor equipment boxes. All subfloor equipment boxes must be characterized.

*Evaluation of Response*

*The Navy indicated that sampling a subset of the equipment boxes at the site is sufficient. Please be advised that all equipment boxes must be inspected and sampled. Field analysis, with confirmatory laboratory analysis may be performed in lieu of full laboratory analysis at each box.*

**54. Section 4.2, Drainage Systems and Outfalls;  
Page 4-7, Whole Section.**

This section of the report discusses the drainage system at Derecktor Shipyard. Due to concerns of storm related releases from the system into the bay there was a discussion of sampling pertinent outfalls during a storm event. The report should note whether this sampling effort was conducted and whether releases to the bay still occurred.

### *Evaluation of Response*

*The Navy noted that the above sampling effort was not included in the Work Plan or discussed in a series of kick off meetings. Discussions of this nature occurred during the Ecological Advisory Boards Meetings, and would have reflected concerns associated with the recent findings of the offshore investigation. Since the two investigations are inter linked and discoveries from one would affect the investigations of the other, the State assumed that any additional warranted on shore work would have been performed, independent of the requirements of the original Work Plan. Therefore this Office reiterates its request that these areas be sampled*

**60. Section 4.2.1.3, Building 234 Area;  
Page 4-11, Whole Section.**

This section of the report discusses the sumps and drainage system in this building. It is the State's understanding that during the remedial investigation approximately 6000 gallons of oil contaminated water was removed from a sump. The report should include a discussion of these findings, including the location of the sump, its approximate size, its function and the source of the water, i.e. seawater or rain water. In addition the report should speculate on the source of the oil.

### *Evaluation of Response*

*The Navy has responded to the first part of the comment, ie the analytical results from the material in the sump will be included in the report. The Office request that the Navy address the rest of the comment.*

**62. Section 4.3.3., Chemistry;  
Page 4-18, Paragraph 2.**

The report includes a discussion of the PCB samples collected at the site. The report should note which sample was collected from the transformer in the northern area identified in the Preliminary Assessment.

### *Evaluation of Response*

*The Navy has indicated that it does not intend to sample the transformer area. The objective of the SASE investigation was to determine the impacts from the activities conducted in this area. Accordingly, potential impacts identified in the Preliminary Assessment would be addressed during this study. Therefore this Office reiterates it request that this area be sampled.*

**63. Section 4.3.5.1, Goal 5;  
Page 4-22, Paragraph 5.**

This section of the report deals with the test pitting activities associated with a probable UST. During this investigation, contamination and piping associated with the UST was uncovered, however, the UST was not found. The report should include the engineering plans or figures which were used to determine the location of the test pits. The actual location of these pits should be overlaid on to these plans.

*Evaluation of Response*

*The Navy has indicated that the investigations in this area indicate that the UST in question were removed at an early date. Although not stated, it is assumed that the Navy will provide the supporting documentation for this action. Please be advised that this documentation should note whether a release had occurred. This information is necessary as it will be used to determine if additional activities are warranted at this location.*

**65. Section 6.1.1, Occurrence and Distribution of the Data and Identification of COPCS  
Page 6-2, Whole Section.**

This section of the report discusses the process for selecting chemicals of concern. The report has not indicated whether all positively detected values were included as COPC or those which met a statistical criteria. Due to the small sample size, it is assumed that all chemicals which had a positive detection were included as COPC. Please modify the report if this is not the case.

*Evaluation of Response*

*The Navy's response elaborates on the selection of chemical of concern. Please be advised that elimination of chemicals of concern is performed when the list of analytes is cumbersome. This is not the case at Dereecktor Shipyard. Therefore, all positively identified compounds must be retained in the risk assessment. Please be advised that, in the future, at sites where elimination of chemicals of concern is warranted, RIDEM's standards as well as Region IX should be used in this process.*

**66. Section 6.1.1, Occurrence and Distribution of the Data and Identification of COPCS  
Page 6-2, Bullet No. 1.**

This section of the report states a chemical was eliminated as a COPC if its concentrations did not exceed a threshold value which was equal to a risk level of 1E-06 or a HQ of 1. Multiple contaminants at a site would result in an exceedance of risk even if the individual chemicals do not exceed a risk value. The State regulations recognize this fact and require that this situation be addressed for site containing multiple contaminants which individually do not exceed a criteria. Therefore, it would be inappropriate to eliminate COPC based upon nonexceedance and the report should be modified accordingly.

### *Evaluation of Response*

*As previously stated elimination of COPC is not warranted at this site and all positively detected compounds should be included in the risk assessment.*

**68. Section 6.1.2, Distributional Analysis for Data and Representation Concentrations; Page 6-3, Whole Section.**

This section of the report discusses the use of the RME and the 95% UCL and Maximum detected value. These values have been used to calculate an overall risk for the site based upon the RME. At other sites on the base a risk based upon maximum exposure is calculated in addition to a risk based upon average exposure. This procedure should be applied at this site, that is risk is based upon maximum concentration or 95% UCL value, (whichever value is higher) and the average exposure concentration.

### *Evaluation of Response*

*The Navy misinterpreted this Office's comment. This Office requested that the Navy risk assessment evaluate two exposure concentrations, one based on the average concentration, the other based upon the maximum or the 95 % UCL, whichever is higher. This approach has been agreed to at other risk assessments performed on this base and at NCBC.*

**70. Section 6.3.3.2, Surface Soils; Page 6-10, Paragraph 3.**

This section of the report acknowledges the potential for contaminants to leach from subsurface soils into the groundwater. The report indicates that this loading was not considered due to the limited number of VOCs detected at the site. Certain metals and SVOCs are considered somewhat mobile. Therefore, the risk assessment should be expanded to include contaminant loading from surface and subsurface soils on to the groundwater.

### *Evaluation of Response*

*The Navy has indicated that the majority of the loading to the groundwater has probably already occurred and that future removal actions will eliminate additional loadings. The Navy's justification for this position is somewhat limited in scope. This Office request that the Navy provide additional justification for this position such as modeling results or appropriate calculations which support their position.*

**71. Section 6.3.3.3, Groundwater; Page 6-10, Last paragraph.**

This section of the report indicates that incidental ingestion of groundwater was considered in the residential scenario. Please indicate whether this incidental ingestion was associated with the use of a residential well (it is assumed that this is the case as wells are not prohibited in residential settings).

### *Evaluation of Response*

*The Navy indicated that as agreed to during the March 5, 1997 meeting groundwater ingestion at the site is unlikely due to the proximity to the ocean. This Office at this and at other sites has indicated that groundwater wells throughout the state are located in close proximity to the ocean. Therefore, this scenario should be examined. During the aforementioned meeting this Office agreed to consider the Navy's proposed elimination, however as stated throughout the meeting the Office's representatives indicated that they would have to consult with the appropriate individuals before agreeing to any proposals. This Office has evaluated the Navy's proposals and feel that groundwater ingestion must be retained in the risk assessment.*