



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

August 18, 1993



Todd Bobar, RPM
U.S. Department of the Navy
Northern Division
10 Industrial Highway
Code 1823 - Mail Stop 82
Lester, PA 19113-2090

RE: EPA's Comments and Technical Issues associated with the
Preliminary Site Assessment Report - Derecktor Shipyard.

Dear Mr. Bobar:

In general, the above-referenced document was thorough in the presentation of the preliminary site assessment findings including the building history and use, the description of current conditions and the contaminants detected, and the descriptions of potential impacts of the contaminants. This document however did not address the minimum preliminary assessment narrative report requirements and did not follow the standard narrative report outline format.

The attached comments have been numbered and sorted into both general and specific comments when possible. Your response to these concerns should reference these comment numbers. The specific comments listed below address grammatical errors, text clarifications, and graphics inconsistencies.

If there are any questions or comments, please feel free to call me at 617/573-9614.

Sincerely,

A handwritten signature in cursive script, appearing to read "Andrew F. Miniuks".

Andrew F. Miniuks, Remedial Project Manager
Federal Facilities Superfund Section

cc: Paul Kulpa, RI DEM/DSR
Greg Fine, RI DEM/DSR
Mike Kulbersh, CDM-FPC



General Comments

Introduction

1. Revise the report to state that a PA was performed, name the agency or organization performing it, and state the authority under which it was conducted. Include in this revision the purpose of the PA and the scope of the investigation.

Site Description, Operational History, and Waste Characteristics

2. Revise the report to include brief directions to the site and the latitude/longitude coordinates. This revision should include a USGS 7.5 minute base maps locating the site and with a 1-mile radius. On this map, clearly identify the surface water drainage route; the nearest water well - both intake and residence; and any wetlands and/or other sensitive environments.
3. Describe any removal actions or remedial measures, whether conducted by facility operators or regulatory authorities, to address facility contamination or release(s).
4. Present all available analytical data in table form and discuss the results.

Pathway and Environmental Hazard Assessment

5. **Ground Water** - Discuss groundwater use within a four-mile radius of the site and identify the nearest drinking water well and state the distance to it. Clearly quantify the drinking water populations served by wells and surface water intakes within the four mile radius.
6. Ensure that this description differentiates between the populations served by private wells and those served by municipal wells; identify any "blended" systems. Identify the drinking water wells suspected to be primary targets of the site contamination and quantify the populations associated with each.
7. **Surface Water** - Identify the water bodies within a 15-mile downstream distance, and state the length of reach, and flow characteristics (including tidal influences) of each.
8. Include a drafted sketch of the surface water migration path and indicate whether surface water along the 15-mile downstream distance supports any fisheries.

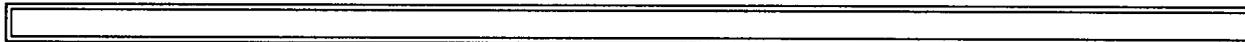
9. Identify each fishery and state the distance from the Probable Point of Entry (PPE) to the nearest fishery. Identify the fisheries suspected to be primary targets.
10. Indicate whether any sensitive environments are present in, or adjacent to, the surface water migration path. Identify sensitive environments suspected to be primary targets.
11. **Soil Exposure and Air** - Revise the report to clearly indicate the number of onsite workers and the number of people who live onsite or within two hundred (200) feet of areas of known or suspected contamination. Quantify the populations within four (4) miles of the site and identify sensitive environments within four (4) miles of the site.

Summary of Conclusion

12. Revise the report to include a summary of the major aspects of the site and site history that relate to the potential for releases of hazardous substances and the exposure of targets. Identify principal pathways and targets of concern.

References

13. Provide a numbered list, in bibliographic citation format, of all references cited in the PA report.



Specific Comments

Page ii, CONTENTS (CONT'D)

14. Correct the following apparent typographical errors:

Appendix D, change "NAVY" to "NAVAL",
Appendix I, change "SMAPLES" to "SAMPLING",
Appendix N, change "DARK" to "DOCK".

Page v, LIST OF FIGURES

15. 1-2 should read: "LEASED AREA - NAVAL EDUCATION AND TRAINING CENTER".

2-1 should read: "PHOTOGRAPH (EXHIBIT) REFERENCE MAP".

Revise this page accordingly.

Page vi, LIST OF EXHIBITS

16. Listed page numbers should appear at the bottom of the Photograph (Exhibit) pages.

SECTION 1.0 - INTRODUCTION

Section 1.1, paragraph 3

17. Clarify "Section 2.0 this report..."

FIGURE 1-1

18. Provide an insert or other method of identifying site location relative to the State boundaries. Include a USGS 7.5-minute base map locating the site and showing a 1-mile radius. On the map, identify the surface water drainage route; nearest well, intake and residence; wetlands and other sensitive environments.

FIGURE 1-2

19. Identify or label Narragansett Bay and Coddington Cove on this map. Indicate on this map that Buildings 40 and 41 are no longer present and that the locations of Huts 1, 2, 4, and 5 are only approximate and should be labeled with a dashed line boundary.

FIGURE 1-3

20. Either add a north arrow and scale to this map or indicate that the drawing is "not to scale".

Section 1.2, paragraph 5

21. Revise this section of the report to indicate the class of hazardous waste generator (e.g. small quantity, large quantity) of the facility and list the RCRIS identification number as RID095971768.

Section 1.4, paragraph 1 (and throughout document)

22. Change "UST's" to "USTs" when used as plural.

Section 1.5, paragraph 3

23. Correct apparent typographical error from "are" to "area".

Section 1.5, paragraph 5

24. Correct apparent typographical error from "stacrolite" to "stauroelite".

Section 1.5, paragraph 8

25. Correct apparent typographical error from "Wiconsit" to "Wisconsin".

Section 1.5, paragraph 9

26. Discuss groundwater use within a 4-mile radius of the study area and quantify the drinking populations served by wells within 4 miles.
27. Differentiate between the populations served by private wells and those served by municipal wells and identify "blended" systems and water wells suspected to be primary targets.

Section 1.5, paragraph 18

28. Identify the nearest drinking water well and state the distance to it, if the depths of these wells are known, then provide this information.
29. Describe the upgradient source areas of these wells and give references to these statements.

SECTION 2.0 - FINDINGS OF PRELIMINARY SITE ASSESSMENT

Section 2.1.1, paragraph 2, bullet #4

30. Correct apparent typographical error from "ships" to "shops"

Section 2.4.1, paragraph 3

31. Correct apparent typographical error from "lathe" to "lathes".

Section 2.4.1, paragraph 4

32. Clarify "In certain areas, ..."

Section 2.4.1, paragraph 5

33. Correct apparent typographical error from "was" to "were".

Section 2.4.1, paragraph 7

34. Clarify "the east side of building..."

35. Correct apparent typographical error from "was" to "were".

FIGURE 2-1

36. Indicate that buildings 40 and 41 are no longer present and that the locations of Huts 1, 2, 4, and 5 are approximate.

37. Inconsistent labelling of exhibits:
"EXHIBIT 2-2A" should be 'EXHIBIT 2-2a A'.

"EXHIBIT 2-2B,C" should be "EXHIBIT 2-2a B, EXHIBIT 2-2b, A".

"EXHIBIT 2-3A,B,C" should be "EXHIBIT 2-3a A, EXHIBIT 2-3b A,B".

"EXHIBIT 2-7a A,B,D", exhibit "2-7 a D" does not exist.

"EXHIBIT 2-76B, exhibit "2-76b" does not exist.

"EXHIBIT 2-8aB" should be "EXHIBIT 2-8a B".

Section 2.7.1, paragraph 2

38. Correct apparent typographical error from "section" to "sections".

Section 2.7.2, paragraph 3

39. Clarify this section of the report to explain the meaning of "2/4" thick steel plate..."

Section 2.7.2, paragraph 4 and Section 2.7.3, paragraph 1

40. There is an apparent inconsistency in the text. Revise this section of the text to clearly state whether the underground storage tank has a capacity of 10,000-gallons or 20,000-gallons.

Section 2.9.1, paragraph 3

41. Correct apparent typographical error from "of the Building 42" to "of Building 42".

Section 2.9.2, paragraph 2, Bullet #3

42. Correct apparent typographical error from "extinguishes" to "extinguishers".

Section 2.9.2, paragraph 9

43. Correct apparent typographical error from "were" to "was".

Section 2.10.2, paragraph 4

44. Revise this sentence to read "It is estimated that an area 75-feet by 30-feet was covered to a depth of up to 3 inches".

Section 2.10.2, paragraph 8

45. Correct apparent typographical error from "points" to "paints".

Section 2.10.2, paragraph 8

46. Clarify sentence "It would not be determined..."

Section 2.10.2, paragraph 13

47. Correct apparent typographical error from "(See Exhibit 2-7)" to "(see Exhibit 2-7d)".

Section 2.12.2, paragraph 1

48. Correct apparent typographical error from "extinguishes" to "extinguishers".

Section 2.13.1, paragraph 5

49. Clarify sentences "This was done..." and "The soil sampling results..."

Section 2.13.2, paragraph 2

50. Correct apparent typographical error from "West of the Building 42 six..." to "West of Building 42, six..."

Section 2.13.3, paragraph 1

51. Clarify the sentence that includes "materials were are..."

Section 2.14.1, paragraph 2

52. Revise this section of the report to state where the transformers were taken to when removed from the site by Derecktor employees.

Section 2.14.2, paragraph 2

53. Clarify sentence that begins with "Based upon observations...". This clarification should clearly describe the contents and actual use of the three "garbage" stands.

Section 2.14.2, paragraph 3

54. Clarify the last two sentences in the paragraph. State whether additional testing of the transformer was performed and whether the additional analysis revealed any contamination in the transformer.

Section 2.14.2, paragraph 5

55. Clarify sentence that begins with "Samples were taken...". Describe the type of samples and provide the supporting information.

SECTION 3.0 - POTENTIAL ROUTES OF CONTAMINANT MIGRATION

Section 3.1, paragraph 2

56. Correct apparent typographical error from "RCP'S" TO "RCPS"

Section 3.1, paragraph 5

57. Clarify sentence that begins with "Sources of contamination..."

SECTION 4.0 - CONCLUSIONS AND RECOMMENDED SAMPLING ACTIVITIES

Section 4.1, Bullet #3

58. Correct apparent typographical error from "This includes" to "These include"