



**RHODE ISLAND**  
**DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**

**OFFICE OF THE DIRECTOR**  
235 Promenade Street, Room 425  
Providence, Rhode Island 02908

March 7, 2019

Mr. David I. Margolis, P.E., PMP  
Chief, Engineering Division  
U.S. Army Corps of Engineers  
New England District  
696 Virginia Road  
Concord, MA 01742-2751

Dear Mr. Margolis:

The Department is in receipt of the U.S. Army Corps of Engineers, New England District (NAE) letter dated January 14, 2019 regarding ongoing the Gould Island FUDS Project. After careful consideration of the NAE's requests for clarification, the Department has prepared the following responses.

1. Recreational User Assumptions for Risk Assessment, Exposure Frequency

The Department concurs with the Army Corps' assumptions outlined in the letter. Specifically, that an exposure frequency of 30 days per year is appropriate for potential future recreational user on the island.

2. Groundwater Use

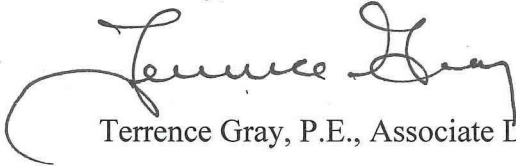
The Department does not concur with the NAE's proposal to rule out the use of groundwater on the island as a source of potable water. NAE's contention that the viability of groundwater use would be impacted by saltwater intrusion is not consistent with historical groundwater use on the island. During operation, the Navy installed and utilized a series of wells on the island. Although these wells alone could not keep up with the demand of the expanding industrial operations on the island, they were nonetheless a viable source of potable water. Providing potable water for a future camping area on the island would be greatly beneficial, particularly given the isolated nature of the island and in cases of emergency.

Furthermore, the Department has enforced the GA Groundwater Objectives, which are applied to groundwater which is presumed to be suitable for drinking water use without treatment, at other

CERCLA cleanups on Gould Island. The Remedial Action Objectives for CERCLA cleanup on the northern portion of Gould Island which is still retained by the Navy (Operable Unit 6 of the Newport Education and Training Center Superfund Site), include the restoration of groundwater quality to its beneficial use. The Remediation Goals for groundwater at this site were chosen based off the Federal Maximum Contaminant Levels (MCLs) and/or the Department's GA Groundwater Objectives.

If you have any additional questions or concerns, please do not hesitate to contact the Department.

Sincerely,

A handwritten signature in black ink, appearing to read "Terrence Gray". The signature is written in a cursive style with a large, sweeping initial "T".

Terrence Gray, P.E., Associate Director for Air, Waste & Compliance



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