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LETTER REGARDING RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL  
MANAGEMENT COMMENTS ON DRAFT EXPLANATION OF SIGNIFICANT DIFFERENCES  
FOR SITE 7 CALF PASTURE POINT NCBC DAVISVILLE RI  
7/22/2013  
RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT



RHODE ISLAND

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

22 July 2013

Mr. Jeffrey Dale, RPM  
US Department of the Navy  
BRAC PMO, Northeast  
4911 South Broad Street  
Building 679, PNBC  
Philadelphia, PA 19112

RE: Draft Explanation of Significant Difference  
Site 07 (Calf Pasture Point)  
Naval Construction Battalion Center  
Davisville, Rhode Island  
Submitted 19 July 2013, Dated 19 July 2013

Dear Mr. Dale:

The Rhode Island Department of Environmental Management, Office of Waste Management (RIDEM) has reviewed the above referenced document. Comments are provided below:

1. Page 1, Section 1.2 Identification of Lead and Support Agencies – This section notes Navy as lead agency and USEPA as lead regulatory agency with RIDEM providing additional regulatory support. Please be advised that the Federal Facilities Agreement (FFA), signed by Navy, USEPA and RIDEM on 23 March 1992 does not identify a “lead agency”. Section II of the FFA implies that all parties are equal. RIDEM would concede, however, with the Navy as lead agency since they are funding, investigating and remediating NCBC. RIDEM does not see where in the FFA a “lead regulatory agency” has been established. Please revise.
2. Page 2, Section 2.1 Site Description History – Since this is a public document a Figure would be helpful for this section which delineates, at minimum, boundaries of Calf Pasture Point, the road network delineating road names, bunker locations and where the excavation took place.

3. Page 3, Section 2.3 Site Contamination – This Section lists other COCs for this site besides PCA and TCE. Please also include nickel as it is a COC.
4. Page 3, Section 2.4 Remedy Selected in the 1999 ROD, Bullet 1 – Please note that the adequate ventilation of any future building construction requirement only applies to the southern portion of Calf Pasture Point (south of the surveyed line).
5. Page 4, Section 6.0 Statutory Determinations – This section states that RIDEM does not have recreational exposure criteria. Please revise to state that recreational exposure criteria are defined in Section 3.68 (Part 2) of the RIDEM Remediation Regulations, Amended 2011.

RIDEM would like to thank you for the opportunity to comment on this document and looks forward to working with the Navy and USEPA. If you have any questions or require additional information please call me at (401) 222-2797 ext. 7138 or e-mail me at richard.gottlieb@dem.ri.gov.

Sincerely,



Richard Gottlieb

Cc: M. Destefano, DEM OWM  
C. Williams, EPA Region 1  
D. Barney, BRAC Environmental Coordinator  
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S. Licardi, ToNK  
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