



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

Department of Environmental Management  
DIVISION OF SITE REMEDIATION  
291 Promenade Street  
Providence, R.I. 02908-5767

16 August 1995

Phil Otis, Remedial Project Manager  
U.S. Department of the Navy  
NAVFACENCOM - Northern Division  
Code 1823, Mail Stop #82  
10 Industrial Highway  
Lester, PA 19113-2090

RE: DRAFT FINAL Record Of Decision, Soils Operable Unit, Sites 05 and 08;  
Former Naval Construction Battalion Center, Davisville, Rhode Island;  
July 1995

Dear Mr. Otis:

The Rhode Island Department of Environmental Management, Division of Site Remediation (RIDEM) has reviewed the above cited document and has noted deficiencies which require modification. RIDEM previously noted these concerns in comments dated 20 June 1995 on the Draft ROD and they continue to be outstanding.

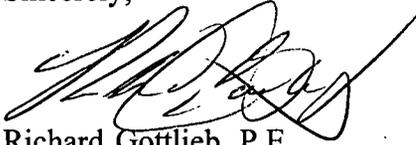
Specifically, RIDEM's comments noted that the Draft ROD references a base-wide groundwater operable unit which has since been modified. Therefore, the final ROD must reflect this revision by stating that Zone 3 has been removed from the base-wide groundwater operable unit and that groundwater for those sites in Zone 3 will be studied as part of site-specific remedies. Furthermore, the final ROD must state that the relationship between Zone 3 and the other zones will be evaluated. The Navy's reply that trying to explain the decoupling of Zone 3 from the rest of the base-wide groundwater operable unit would confuse the public is unacceptable.

As noted in RIDEM's 25 July 1995 correspondence, the State maintains that the revised schedule for the FFA calls for a base-wide groundwater operable unit and this information has been presented to the public. Confusing or not, this information must be made available to the public in this ROD since the Soils Operable Unit references the base-wide groundwater operable unit. Therefore, RIDEM requires that the ROD be modified accordingly.

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Thank you for your anticipated cooperation in this matter. If you have any questions or require additional information please call me at (401) 277-3872 ext. 7138 or Judith Graham at ext.7142.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard Gottlieb', written over a horizontal line.

Richard Gottlieb, P.E.  
Principal Sanitary Engineer

cc: W. Angell, DEM DSR  
J. Graham, DEM DSR  
C. Williams, USEPA Region 1