



State of Rhode Island and Providence Plantations
D partm nt of Environm ntal Management
Office of Waste Management
235 Promenade Street
Providence, RI 02908

5 February 1997

Mr. Philip Otis, P.E., Remedial Project Manager
US Department of the Navy, Northern Division
Code 18, Mail Stop #82
19 Industrial Highway
Lester, PA 19113-2090

RE: Draft Feasibility Study
Site 07 - Calf Pasture Point
Naval Construction Battalion Center
Davisville, Rhode Island
Submitted 2 January 1997, Dated January 1997

Dear Mr. Otis;

The Rhode Island Department of Environmental Management (RIDEM) Office of Waste Management has reviewed the above referenced document and comments are attached.

If you have any questions or require additional information please call me at (401) 277-3872 ext. 7138.

Sincerely,

Richard Gottlieb, P.E.
Principal Sanitary Engineer

Attachment:

cc: W. Angell, DEM OWM
C. Williams, EPA Region 1
H. Cohen, RIEDC
M. Cohen, ToNK
W. Davis, CSO NCBC

letter1.rwg/richg

Comments For:

**Draft Feasibility Study Report
Site 07 - Calf Pasture Point
Naval Construction Battalion Center
Davisville, Rhode Island**

Submitted 2 January 1997, Dated January 1997

1. General Comment.

All the alternatives, with the exception of the no-action alternative, throughout the document refer to a deed notification to prevent the use of groundwater. Please be advised that due to the quality of the groundwater a deed restriction will be required. Please change deed notification to deed restriction. Some, but not all, have been listed below. In addition, it should be explained within the feasibility study who will enforce the deed restriction. If a deed restriction cannot be implemented, then remediation of the groundwater will be required.

2. Page ES-4, Results of the Phase III RI (Ground-Water Impact on Surface Water); Paragraph 1, Last Sentence.

Therefore, there does not appear to be an adverse impact to the surface water quality.

As the Navy is aware, the State feels that geologic information from Allen Harbor is needed to validate the groundwater modelling results. Therefore, please add the phrase "at this time" to the end of the above noted sentence.

3. Page ES-5, Results of Human Health Risk Assessment; Paragraph 3, Sentence 1.

This paragraph states that use of deep and bedrock groundwater for drinking and showering purposes are hypothetical scenarios. Since this area is designated for recreational/conservation the State believes these scenarios are very plausible. Therefore, please change the word "hypothetical" to "possible".

4. Page 2-8, Section 2.5, Remedial Action Objectives; Paragraph 3, Sentence 2.

Please change "hypothetical pathways" to "possible pathways".

5. Page 2-12, Section 2.7.2.3, Site Use Restriction/Limitations; Paragraph 3, Sentence 1.

Please change both "deed notifications" in this sentence to "deed restrictions".

6. **Page 2-33, Section 2.7.6, Ground-Water Discharge Actions (Discharge to POTW);
Bullet 2.**

This bullet notes that the discharge to a POTW is regulated by the North Kingstown Department of Public Works. Please revise this to reflect that the discharge would be regulated by the Rhode Island Economic Development Corporation.

7. **Page 3-1, Section 3.1, Development of Remedial Alternatives;
Paragraph 3, Sentence 1.**

Please change "deed notifications" to "deed restrictions".

8. **Page 3-2, Section 3.1.2, Alternative 2: Institutional Controls;
Bullet 1.**

Please change "deed notifications" to "deed restrictions".

9. **Page 3-10, Section 3.2.2.1, Alternative 2: Institutional Control (Effectiveness);
Paragraph 1, Last Sentence.**

The 5-year reviews would be effective in the long-term for evaluating the Institutional Control decision.

Due to the identified contaminated plume, monitoring of groundwater would be required at a frequency greater than once every five years, perhaps initially on a quarterly basis. This frequency could be decreased in the future based on results obtained. This should be reflected in this alternative.

10. **Page 3-10, Section 3.2.2.2, Alternative 2: Institutional Control (Implementability);
Paragraph 1, Sentence 2.**

Please change "deed notifications" to "deed restrictions".

11. **Page 4-5, Section 4.4.2.1, Overall protection of Human Health and the Environment;
Paragraph 1, Sentence 1.**

Please change "deed notifications" to "deed restrictions".

12. **Page 4-6, Section 4.4.2.3, Long-Term Effectiveness and Permanence;
Paragraph 1, Sentence 1.**

Please change "deed notifications" to "deed restrictions".