



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

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

28 May 1997

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

RE: Proposed Plan - Site 07 - Calf Pasture Point
NCBC Davisville, Rhode Island
Submitted 25 April 1997, Dated April 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. In principal, RIDEM finds alternative 2 (Institutional Controls) to be acceptable provided the monitoring plan is modified to include sediment and surface water sampling as described in our 21 May 1997 letter to you regarding this site. Again, RIDEM reiterates its concern that geologic information about Allen Harbor is necessary to locate possible discharge points for the contaminated plume under Calf Pasture Point. In the event that a mutually agreeable monitoring plan cannot be worked out then RIDEM would recommend one of the "treatment" alternatives be implemented.

RIDEM looks forward to working with the Navy and EPA to finalizing this proposed plan. 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
J. Shultz, EA Eng.

letter1.rwg/richg

Comments For:

**Proposed Plan
Site 07 - Calf Pasture Point
Naval Construction Battalion Center
Davisville, Rhode Island**

Submitted 25 April 1997, Dated April 1997

1. Page 1, Column 2, Shaded Area entitled "Proposed Plan Summary Institutional Controls".

This shaded area notes land use restrictions, groundwater monitoring, and 5-year reviews as the institutional controls. The title of the shaded area should be changed to read "Proposed Plan Summary - Institutional Controls and Monitoring". In addition, please add that sediment and surface waters on Calf Pasture Point would also be monitored. Please refer to RIDEM's 21 May 1997 letter which explains the rationale for this request.

2. Page 14, Bullet 3, Sentence 1.

This bullet states that no offsite receptors or media are anticipated to be impacted by the continued migration of COC in groundwater. Please revise this sentence to note that sediment and surfacewater monitoring will be incorporated into the monitoring plan to insure that no offsite receptors or media are being affected. As noted in RIDEM's 21 May 1997 letter, this would be in compliance with the Water Quality Regulations.

3. Page 15, Definitions.

The definition stated for metals is "Naturally occurring elements found in soil and ground water". Carbon is also a naturally occurring element found in soil and groundwater, yet it is not a metal. In addition, metals can also be found in surface waters. Please revise the definition to better define metals.