

NAVY RESPONSES TO RIDEM COMMENTS ON CHANGED PAGES FOR SITE 7 FS AND RTCs

The following Navy responses pertain to RIDEM's comments (dated 23 June 1998) on the Site 07 (Calf Pasture Point) Pre-Final Feasibility Study, dated April 1998. The Pre-Final FS consisted of changed pages resulting from the incorporation of regulator comments on the Draft Final FS dated April 1997 and related Site 07 documents.

Comment 1. The Navy makes references throughout the document that there is no complete pathway to ecological receptors and therefore no potential risk. RIDEM disagrees with this statement since the potential exists for VOC to migrate from the site to sediments in Allen Harbor and Narragansett Bay. Though to date this has not been observed, the modeling and geologic information show the potential for deep groundwater to discharge along the shores of Calf Pasture Point. RIDEM has concerns that VOC in sediments can adversely affect shellfish which live in the sediments. Please revise these statements accordingly.

Response: The Navy previously has agreed to change references from An_o completed pathway \cong (between the VOC plume and offshore sediment) to An_o completed risk pathway \cong (see Response to Proposed Plan comment #10, May 1998). The text will be changed accordingly.

Comment 2. In Chapter 2, Page 35 please change "North Kingstown POTW" to "RIEDC POTW" as North Kingstown does not have a sewer system.

Response: The text will be changed accordingly.

Comment 3. The Remedial Investigations and Risk Analyses must be included on the deed when the restriction prohibiting the use of groundwater is placed.

Response: The comment is noted for the future remedial action at Site 07.

Comment 4. Section 5.1 states that it will be the responsibility of the Town of North Kingstown to enforce the groundwater use restriction at Calf Pasture Point. The issue of deed restriction enforcement has not been fully discussed and there is no correspondence from the Town to indicate that they will accept responsibility of enforcing deed restrictions.

Response: Section 5.1 states that it will be the responsibility of the Town of North Kingstown (i.e., the future property owner as currently planned via public benefit conveyance) to abide by the requirements of the deed restriction. The Navy will be responsible for seeing that the deed restriction continues to be protective of human health and the environment. As discussed during the development of the Navy's Long-Term Risk Monitoring Plan for Site 07, the Navy's role will include periodic inspections of the land use.