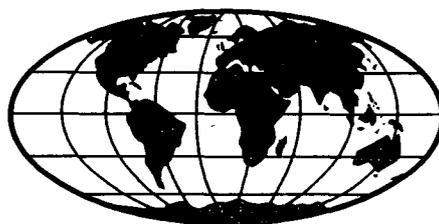


P.O. Box 640  
Rehoboth, MA 02769  
Tel: 1-800-643-9106



N62578.AR.001451  
NCBC DAVISVILLE  
5090.3a

P.O. Box 5250  
Wakefield, RI 02880-0894  
Tel: (401) 792-8260  
Fax: (401) 792-3730

## APPLIED ENVIRO-TECH INCORPORATED

January 8, 1999

Mr. Phil Otis, US Department of the Navy  
Northern Division-NAVFAC  
10 Industrial Highway  
Code 1811/PO - Mail Stop 82  
Lester, PA 19113-2090

RE: Proposed Plan & Revised Long Term Monitoring Plan  
Calf Pasture Point (07)

Dear Mr. Otis:

Applied Enviro-Tech, Inc. (Applied), Technical Advisor for the TAG and on behalf of the Rhode Island Resource Conservation & Development Council, Inc. (RI RC&D) is pleased to submit comments on the following:

1. Proposed Plan, Calf Pasture Point (Site 07)  
Naval Construction Battalion Center, (NCBC)  
North Kingstown, RI - October 1998
2. Revised Long Term Risk Monitoring Plan for Site 7, Calf Pasture Point,  
NCBC North Kingstown, RI - November 23, 1998

The final (Site 07) Proposed Plan outlines deed restrictions on ground water use and long term monitoring of groundwater. The deed restriction is intended to prevent human contact with or use of contaminated groundwater. The long term monitoring is intended to 1) verify that the defined plume is remaining stable or decreasing, 2) confirm that the groundwater beneath the site continues to pose no unacceptable risks to human health or the environment, 3) confirm groundwater discharges to the surface continue to pose no risks to human health or the environment, 4) ensure that the groundwater use restrictions remain effective.

Page 2  
Applied comments  
Jan. 8, 1999

Applied's comments and concerns centering around the deed restrictions are as follows:

1. A concise and practical plan to enforce these restrictions is needed to protect the town against future liabilities in policing these restrictions.
2. A clear cut "performance criteria" should be defined to outline release of these restrictions at some future time.
3. Clear definition of the roles and responsibilities and enforcement options should be outlined for all involved parties i.e., state, navy, and town.

2) The following comments are provided for the Long Term Monitoring Plan for Site 7, Calf Pasture Point, dated November 23, 1998.

The section on deed restrictions discusses periodic site inspections and release of the restriction when clean-up levels are met. Further detail is needed for the periodic site inspections and definition of how clean-up levels will be defined.

Applied, without additional technical document review for this site, cannot comment on the specific sampling parameters and frequency, however, based on this brief review the analysis and frequency appear comprehensive.

Applied would like to see identified public participation opportunities noted in this plan to allow review of the findings of the Long Term Monitoring Plan.

Please call Anne Heffron, Technical Advisor, @ (401) 792-8260 should you have any concerns regarding the above. Thank you.

APPLIED ENVIRO-TECH, INC.



Anne Heffron, RPG  
President