



RHODE ISLAND  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-831-5508

12 January 1999

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: Draft Record of Decision  
Site 07, Calf Pasture Point  
NCBC Davisville, Rhode Island  
Submitted 14 December 1998, Dated December 1998

Dear Mr. Otis;

The Rhode Island Department of Environmental Management, Office of Waste Management (RIDEM) has reviewed the above referenced document and comments are attached. Please be advised there may be additional comments.

If you have any questions or require additional information please call me at (401) 222-2797 ext.7138.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Gottlieb".

Richard Gottlieb, P.E.  
Principal Engineer

cc: W. Angell, OWM DEM  
C. Williams, EPA Region 1  
H. Cohen, RIEDC

S. Licardi, ToNK  
W. Davis, CSO NCBC  
J. Shultz, EA Eng.

RIDEM Comments For:

**Draft Record of Decision  
Site 07 - Calf Pasture Point  
Naval Construction Battalion Center  
Davisville, Rhode Island**

Submitted 14 December 1998, Dated December 1998

**1. Page 2 of 2, Declaration Page;  
Bullet 2.**

This bullet states that other media such as surface water or sediment from the shoreline or interior wetlands *may* be sampled as warranted. Please revise this sentence to state that the aforementioned media *will* be sampled in accordance with the long term monitoring plan. Section 4 of the proposed "Revised Long term Risk Monitoring Plan for Site 7, dated 23 November 1998 calls for a minimum sampling of these media 7 times every nine months during the first five years of the monitoring plan.

**2. Page 7, Section IV, Scope and Role of Response Action;  
Paragraph 2.**

This paragraph should state who will enforce the deed restrictions. Page 31, Section X, Bullet 1 seems to imply that the Navy will enforce the deed restriction. If this is the case it should be so stated in this Section.

**3. Page 13, Section VI, Summary of Site Risks, Results of Human health Risk  
Assessment;  
Paragraph 2, Sentence 1.**

*Potential human health risks associated with exposure to the COCs were estimated through the development of several hypothetical exposure pathways. These pathways were developed to reflect the potential for exposure to COCs based on present uses, the potential future uses, and the location of the site.*

The majority of risk scenarios developed were not hypothetical, but were based on probable use scenarios outlined in the approved Base Reuse Plan (recreational uses). It is misleading to the public to imply that the risk analysis was based solely on hypothetical scenarios. Please revise these sentences to:

*Potential human health risks associated with exposure to the COCs were developed to reflect the potential for exposure based on present uses, the potential future uses, and the location of the site.*

**4. Page 16, Section VI, Summary of Site Risks, Marine Ecological Risk Assessment;  
Paragraph 1, Sentence 2.**

This sentence references Figure 13 for sampling locations. With respect to Figure 13

please state what the difference is between Raps2.shp and Stats27.shp sampling locations as no information is provided in the text or Figure. This will help the public better understand the document.

**5. Page 17, Section VII, Development and Screening of Alternatives; Paragraph 4, Sentence 1.**

*As described in Section V, no Remedial Action Objectives were required for surface soil, subsurface soil, sediment, wetlands, or shellfish.*

Please remove wetlands from the above sentence as it is not discussed in section V. In addition, while currently there does not appear to be contamination of sediment, wetlands, and shellfish as a result of the contamination at Site 7 there is concern that it could migrate to these areas which is why we have included it in our long term monitoring plan. Therefore, the above sentence should be modified accordingly.

**6. Page 31, Section X, Selected Remedy; Bullet 1, Sentence 3.**

*The deed restriction will cover the portion of Calf Pasture Point south of the bedrock outcrop (see Figure 4).*

The area the groundwater deed restriction applies to should be delineated on Figure 4 to make it clear where groundwater can and cannot be extracted from. For example, does the deed restriction apply to the eastern most beaches? In addition, how has the Navy responded to the concern that the entire site should have the groundwater deed restriction (a concern raised at the hearing).

**7. General Comment.**

This ROD states that the groundwater under the site is GB. Please revise this to state that the groundwater under most of the site is GA-NA, and the remainder of the site is GA.

**8. General Comment.**

USEPA comments 23 and 29 on the same subject in a letter dated 8 January 1999 requests that the Navy remove the Site Remediation Regulations as ARARs due to Rule 4.02 of the Site Remediation Regulations. Please be advised that the intent of Rule 4.02 was to avoid having responsible parties duplicate essentially the same administrative process, CERCLA vs State. This rule was included at the request of USEPA. RIDEM did not, however, agree to waive its standards for soil and groundwater.

RIDEM feels that it is much more economical to comply with the Site Remediation Regulations during the CERCLA process rather than wait until later. Waiting until after the CERCLA process would require the re-investigation of this site to address the RIDEM regulations. RIDEM therefore, requests that the Navy retain the Site Remediation Regulations as ARARs.