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Bcc:

From: CHRISTINE WILLIAMS <WILLIAMS.CHRISTINE@EPAMAIL.EPA.GOV>

Subject: Site 2 Close out report comments

Date: Wednesday, September 4, 1996 15:00:35 EDT

Attach: DCLS2, Headers.822

Certify: N

Forwarded by:

September 4, 1996

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

Re: Draft Closeout Report for IR Program Site 02 at the former Naval Construction Battalion Center Davisville, Rhode Island, Dated 23 August 1996

Dear Mr. Otis:

Pursuant to ? 12.5 of the NCBC Federal Facility Agreement (FFA), the Environmental Protection Agency's (EPA) has reviewed the above referenced document. In this document, the Navy has indicated that the Action Memorandum cleanup objective for lead of 10,000 mg/kg and TPH of 500 ppm has been achieved at this site. As the Action Memorandum has stated, and in accordance with RIDEM Policy, the Navy should now develop a lead management plan for the site.

This letter will confirm that EPA finds that the document, if modified to include all of the changes set forth in the enclosed comments, will comply with the requirements of the EPA guidance document Superfund Removal Procedures; Removal Response Reporting: POLREPs and OSC Reports.

EPA requests that the Navy respond to the attached comments IAW ? 12.5 of the FFA, with either a written response to comments or a revised final report. If you have any questions with regard to this letter, please contact me at (617) 573-5736.

Sincerely,

Christine A.P. Williams, RPM
Federal Facilities Superfund Section

Enclosure

cc:Christi Davis, NORTHDIV
Richard Gottlieb, RIDEM
Walter Davis, CSO
Tim Prior, USF&WL
Jayne Michaud, EPA
Dean Tagliaferro, EPA
Linda Gardiner, Stone & Webster Eng.

--> ATTACHEMENT: DCLS2 <--

EPA Review of Draft Removal Closeout Report - Site 02

1. In Section 1 add a paragraph to explain how the site fits into the overall plan for zone 3, such as:

Groundwater under Site 2 is currently being investigated with Site 3 and Study Areas 1 & 4 groundwater. Any actions proposed for Site 2 will be included in the proposed remedial action plan for the geographic area including Site 3 and Study Areas 1 & 4. This proposed plan is expected to be released to the public in the fall of 1997.

2. Also in Section 1 add a paragraph indicating when the trustees were notified about a possible threat, such as:

On May 17, 1991 the Department of Navy sent written notification to the Department of Interior and the Department of Commerce of the potential damages to natural resources resulting from releases under investigation a NCBC Davisville.

3. Additionally in section 1 add a paragraph describing the community relations performed before and during removal activities, such as:

On Monday June 3, 1996 the Navy provided public notice of construction activities at the site. The Navy has also conducted RAB meetings on March 14, June 13, and August 15, 1996 which included removal activity updates for the general public.

4. Also add the estimated cost of this removal, such as:

As stated in the action memorandum dated May 23, 1996, this removal was estimated to cost between \$1,600,000 to \$3,600,000. While the final invoices have not yet submitted, the total cost for this effort is estimated to cost [Navy should fill in the blank here].

5. Page 1, please clarify the purpose of the additional report to be prepared by Foster Wheeler. This report should be forwarded to EPA.

6. Page 7, section 3.1, ¶3; add the numeric values of the cleanup criteria.

7. Table 2-1 provides quantities of waste shipped off-site. The quantities in the Report are "drums" and "roll-offs". Provide estimated weights or volumes as well (e.g., "12 drums (approx. 600 gallons)", or "2 roll-offs (approx. 60 cubic yards)").

8. The manifests attached should include the facility Owner Certification signature. The Navy should have received these copies back from the disposal facilities by now.