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NCBC DAVISVILLE  
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# STONE & WEBSTER ENVIRONMENTAL TECHNOLOGY & SERVICES



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December 21, 1995

J.O. No. 04291.0810  
T40-029

Attn: Mr. Phil Otis  
Remedial Project Manager/BRAC Environmental Coordinator

Contract No. N62472-92-D-1296, CTO No. 0040  
Response to RIDEM Comments  
Draft Non-Time-Critical Action Memorandum - Study Area 4  
Naval Construction Battalion Center

The following are responses to the Rhode Island Department of Environmental Management's (RIDEM) comments dated 12 December 1995 on the above referenced document. The number of the response corresponds to the number of the RIDEM comment.

1. The statement regarding the applicability of enforcement strategies will be removed from the document as enforcement actions could be undertaken by the State.
2. The ARAR Table will be modified to reflect the addition of the Rhode Island General Laws, Chapter 18.9, Refuse Disposal and the Rhode Island Solid Waste Regulations.

Please feel free to contact me at (617) 589-8323 if you have any questions.

Sincerely,

Lisa O. Brandon, P.E.  
CTO Manager

cc: LFayan - Navy

CWHoulik - EA  
NLanney - EA

CWilliams - EPA  
RGottlieb - RIDEM

**Comments For:****Action Memorandum For  
Study Area 4 at  
NCBC Davisville, RI  
27 November 1995**

1. **Page 13, Section 2.7, Enforcement;  
Paragraph 1, Last Sentence.**

*Therefore, enforcement strategies do not apply to this removal action.*

The State of Rhode Island, at this time, has no reason to initiate enforcement actions. If the Navy were to not comply with Rhode Island rules and regulations enforcement actions could be undertaken by the State. The above sentence should be removed from the document.

2. **Table 2-5, Federal and State Action-Specific ARARs and TBCs.**

Please note that Rhode Island General Laws, Chapter 18.9, Refuse Disposal, and in particular 23-18.9-5 (Disposal of Refuse at Other than a Licensed Facility) is an ARAR since more than three cubic feet of material is present at the site. This should be added as an ARAR to this Table. In addition Rhode Island Solid waste regulations should be observed.

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TOTAL P.02

TOTAL P.03