



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

Department of Environmental Management  
DIVISION OF SITE REMEDIATION  
291 Promenade Street  
Providence, R.I. 02908-5767

5 August 1994

Mr. Robert Krivinskas, Remedial Project Manager  
U.S. Department of the Navy  
NAVFACENCOM - Northern Division  
Code 1823, Mail Stop #82  
10 Industrial Highway  
Lester, PA 19113-2090

RE: Site 09 - Allen Harbor Landfill;  
Naval Construction Battalion Center (NCBC), Davisville, RI.

Dear Mr. Krivinskas:

This letter is in response to the Navy's proposal to award a contract this year for the construction of a RCRA Subtitle C cap at the Allen Harbor Landfill. As I am sure that you are aware, the Navy cannot initiate construction activities prior to the signing of a Record of Decision (ROD) and thereby is taking a risk in awarding such a contract. Please note that while the Rhode Island Department of Environmental Management (RIDEM) supports such a cap as being an appropriate part of a whole site remedy, there are a number of outstanding issues which may potentially impact the final decision and ultimately, the final design. It is imperative that we continue to work together towards developing a ROD that results in a complete, whole site remedy.

The major outstanding issues which may have an impact on the final Remedial Design/Remedial Action (RD/RA) for the site are outlined below. These issues must be addressed prior to finalizing a cap design.

1. Groundwater Modelling:

Additional groundwater modelling and groundwater investigations are required to determine the impact the landfill is having on the harbor and to better understand the migration of contamination into harbor waters. Particularly consideration must be given to tidal influences.

2. Near Shore Sediments:

Delineation of the nature and extent of the near shore sediment contamination which will require an ecological risk assessment. In order to avoid scheduling conflicts it is imperative that this issue be addressed expeditiously so that all information will be available upon final cap design review.

3. Wetlands:

The nature and extent of impacts on wetlands, both as a result of possible contamination from the landfill and as a result of construction of a cap and associated appurtenances must be evaluated.

4. Whole Site Remediation:

Proposals for whole site remediation which may potentially need to be integrated with the cap design.

5. Public Participation:

The State of Rhode Island recognizes the need for public participation and comment in this important decision making process. This site is particularly important to the State and local community and any decision made will have significant impacts on many stakeholders. Therefore, if the Navy, along with the EPA and RIDEM, is going to expedite the remediation process, it is vitally important that ample opportunity for public comment and participation be allowed.

I am unsure as to how the EPA presumptive remedy guidance addresses this matter, but I would suggest that the Navy begin the public participation process, i.e. public informational meetings, etc., as soon as possible.

Finally, the schedule as currently proposed would result in a ROD signature date in late 1995 at the earliest. RIDEM suggests that the interested parties work towards a more accelerated schedule so that we may achieve an earlier ROD signing and ultimately an earlier initiation of remedial activities at this site.

RIDEM looks forward to working with the Navy and the EPA to accomplish these goals. If you have any questions or require additional information please call me at (401) 277-3872 ext. 7138.

Sincerely,



Richard Gottlieb, P.E.  
Principal Sanitary Engineer

cc: W. Angell, DEM DSR  
J. Graham, DEM DSR  
C. Williams, USEPA Region I