



DEPARTMENT OF THE NAVY

NORTHERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
10 INDUSTRIAL HIGHWAY
MAIL STOP, #82
LESTER, PA 19113-2090

N62578.AR.000691
NCBC DAVISVILLE
5090.3a

IN REPLY REFER TO

1823/PO
17 September 1996

Ms. Christine A.P. Williams
U.S. Environmental Protection Agency
Region 1
J.F Kennedy Building HBT
Boston, MA 02203-2211

Mr. Richard Gottlieb
Division of Site Remediation
Rhode Island Department of Environmental Management
291 Promenade Street
Providence, RI 02908-5767

Re: SELECTION OF REMEDIAL ACTION FOR IR SITE 09, ALLEN HARBOR
LANDFILL, NCBC DAVISVILLE, RI

Dear Ms. Williams and Mr. Gottlieb,

EPA Region 1 has taken the position that the Proposed Remedial Action Plan (PRAP) for Site 09, Allen Harbor Landfill at NCBC Davisville must clearly set forth the Navy's preferred alternative. As you are aware, there are two areas in which the EPA, RIDEM and the Navy have been unable to reach consensus upon the interpretation of the extensive data we have collected. These general areas are 1. the need for and appropriateness of a cap with an impermeable liner at this landfill in a coastal plain environment and 2. that there is not sufficient certainty that the data support a conclusion that ground water is not a significant transporter of constituents to the Allen Harbor sediments without collecting a substantial amount of new data.

Presentations at the BCT Seminar in Charleston, SC in July 1996 by Dr. S Rouhani on the application of geostatistics to describing the certainty associated with data and by David Ray, U.S. Army Corps of Engineers, Omaha District, on landfill cover applications suggested a source of expertise to help resolve the above issues. The Navy has engaged Dr. Rouhani's firm, Newfields, Inc., and David Ray to review the project documents with regard to these concerns. On 12 September 1996, the results of an initial analysis of the Site 09 project documents by the consultants were reviewed by the Navy. This review established that a geostatistical analysis of the site specific data would add considerably to our understanding of the project data and contaminant transport mechanisms. Additional data collection activities, if required, would focus on reducing the uncertainty associated with a particular transport

mechanism to a mutually acceptable level. There is also a real concern about the appropriateness of an impermeable liner as a component of a landfill cap in a coastal flood plain.

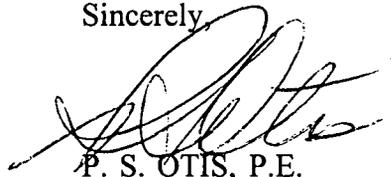
The Navy has received a preliminary report by letter of 10 September 1996 on the Investigation of Ground Water Discharge Into Allen Harbor Davisville, RI by the University of Rhode Island. A copy is enclosed for your review. The report will be considered by the consultants in their evaluation.

The Navy has authorized Newfields and Mr. Ray to complete their review and analysis and provide a report of their findings and recommendations as a hard copy for BCT review by 31 October 1996 with a presentation on 6 November 1996 or when the BCT would be prepared.

Based on the information presented as a result of the preliminary review, it appears that there may be recommendations for significant changes to the proposed plan that is currently under review. The new information being developed should be incorporated into the RI and FS as well. Accordingly, the Navy requests that the schedule be adjusted to allow for the presentation in November and consideration by the BCT of the new information before finalizing the RI and FS and proceeding further with the Proposed Remedial Action Plan. When dates are finalized for the presentation, we can establish new dates for the balance of the actions to achieve the Record of Decision.

I look forward to working with you to select the best remedial action available as a mutually preferred alternative and moving forward toward implementation. If there are any questions, please call me at (610) 595-0567 ext. 155.

Sincerely,



P. S. OTIS, P.E.

Remedial Project Manager

by direction of the Commanding Officer

Copy to:

RIEDC - H. Cohen

TONK - S. Licardi

URI - D. Urish

CSO Davisville, RI

Internal copies:

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1831/SH

EA - J. Shultz

NEWFIELDS - S. Rouhani

ACOE - D. Ray