



INCORPORATED 1674

TOWN OF
NORTH KINGSTOWN, RHODE ISLAND

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October 24, 1996

Captain Paul D. Chamberlin, Commanding Officer
Department of the Navy
Northern Division
Naval Facilities Engineering Command
10 Industrial Highway
Mail Stop #82
Lester, PA 19113-2090

RE: CBC Davisville, IR Site 09, Allen Harbor Landfill

Dear Captain Chamberlin:

The Town of North Kingstown respectfully requests that the Department of the Navy integrate the dredging of Allen Harbor channel into the proposed remedial action plan for IR site 09, Allen Harbor Landfill. We believe that the use of dredged sediments for landfill capping provides not only the most environmentally sound solution but a comprehensive and practical solution which will promote successful base reuse.

Both the Phase III Remedial Investigation Report and Feasibility Report for Allen Harbor Landfill are in final draft form. Information contained in these reports supports the need for a RCRA Subtitle "C" cap for this site. Discussion and correspondence from both the USEPA and the RIDEM support this proposed action. The Town of North Kingstown concurs based on the carcinogenic human health risk posed from surface soil exposure at the site.

At issue has been the question of whether to include as a part of the RCRA "C" cap proposal the dredging of materials from the entrance to Allen Harbor or purchasing soil from offsite and transporting it to the landfill. The Harbor entrance sediments have been tested by the Town at the request of the Navy for chemical and physical parameters and found to be acceptable for use in the landfill cap by Navy consultants.

Consistent with national environmental policy which includes socio-economic conditions as an integral part of our environment we believe the Navy has an opportunity to accomplish multiple goals of environmental clean up and promoting successful reuse by incorporating channel dredging into this remedial action. It is a practical solution. The Town's experts DOCKO, Inc. indicate there is little difference in the costs associated with dredging vs.

purchased materials. The numbers prepared by the Navy's contractor estimated the difference at less than \$100,000. This is less than one (1) percent of the cost of capping the Landfill and will offer a more comprehensive environmental solution to cleaning up the base.

We believe that the use of dredged sediments from Allen Harbor channel provides a synergistic solution to the capping of the Allen Harbor Landfill. First of all the use of dredged material recycles material rather than mining new materials. This is consistent with the overall NEPA direction of minimal environmental disruption. Secondly, the use of dredged materials for the proposed wetland restoration/creation at the base of the landfill slopes is logical since the sediments were in all likelihood originally from wetlands in the area. In addition the materials from the channel are more appropriate for wetlands' restoration since they are not virgin inland material which is what would be purchased from a material supplier. Third, the use of the dredged materials will enhance the ability to use Allen Harbor, one of the few sheltered harbors in Rhode Island. A sheltered harbor offers a unique opportunity to protect boats during storms. By restoring the channel to its original depths the protective aspects of the Harbor can be used more fully, thereby reducing environmental damage in the future. Finally, the use of the dredged materials for capping the landfill will further the environmental restoration of Narragansett Bay by encouraging the use of a state-funded boat pump-out facility. The use of this facility is currently limited by the inability of large vessels to enter the harbor.

The Navy has had a presence in North Kingstown since 1942. The closing of NAS Quonset Point in 1974 had a negative economic impact on the community. The process of closing CBC Davisville in 1994 incorporated a process intended to minimize impacts on the community and maximize reuse potential. The formation of the community base reuse committee to assist in the transition of the base to civilian uses was to provide a "blueprint" for the community and the Navy alike to follow, setting the stage for a cooperative effort. The stated goal of the Base Reuse Plan is "to assist the community in fostering the creation of much needed economic development and jobs at a time when economic restructuring is paramount in public policy and planning." The Navy's required Environmental Impact Statement (EIS) is based on the recommendations of the Base Reuse Plan and successful base reuse is dependent on the expeditious and appropriate remediation of contaminated sites. Curing the landfill by incorporating the dredging of the Harbor entrance and the reuse of those sediments respects the cooperative effort the Navy and Town have enjoyed, responds to the spirit of the base reuse plan and the EIS, and sets the stage for healthy and successful use of Allen Harbor.

We trust that the Navy will honor this request and look forward to hearing from you shortly.

Sincerely,



Richard Kerbel
Town Manager