



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

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

28 January 1997

Mr. Al Haring
U.S. Department of the Navy
Northern Division - NAVFAC
10 Industrial Highway
Code 1823, Mail Stop 82
Lester, PA 19113-2090

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

Dear Mr. Haring:

I am writing in response to your recent letter dated 24 January 1997 in which you have summarized the series of meetings which transpired in December ultimately resulting in the final decision for a hybrid RCRA 'C' cap design for the Allen Harbor Landfill. I find it necessary to respond as I am particularly troubled by the manner in which you have characterized RIDEM and EPA's participation in the meeting of 13 December 1996.

While I obviously am not able to speak for EPA, I can assure you that RIDEM did not come only prepared to discuss the one option of a "partial multimedia cap" as you have stated in your letter. RIDEM came to that meeting willing to discuss a full range of options as presented by the Navy which I thought that we had successfully accomplished. In fact, the "partial" capping scenario evolved during that meeting. Also, I thought that the meeting was greatly enhanced by including two "fresh" views on the situation provided by Tim Bramhall from Northern Division and Edward Hathaway from the EPA, both of whom were not intimately involved in the long process leading up to that meeting.

As an example of our willingness to cooperate and be open-minded during that meeting, RIDEM suggested the alternative of reconsolidating outlying portions of the landfill to reduce the total area requiring capping, thereby reducing capping and maintenance costs. The Navy rejected this alternative citing fear of excavating hazardous materials. As you are well aware, this is exactly why RIDEM is requiring a RCRA 'C' cap and not allowing the less protective soil one as preferred by the Navy. A preference which is again repeated in your recent letter.

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Please note that RIDEM and EPA have offered the Navy a significant compromise for the closure of this site. Specifically, we have relaxed our requirement for vertical containment to control groundwater migration which will instead be kept in check by long-term monitoring.

In closing, I believe that is time for all parties to accept the outcome of these protracted investigations and negotiations and move forward with closing this landfill.

Sincerely,



Warren S. Angell II, Supervising Engineer
Office of Waste Management

cc: H. Cohen, RIEDC
M. Cohen, ToNK
R. Gottlieb, RIDEM OWM
T. Gray, Director, DEM OWM
M. Sanderson, EPA
C. Williams, EPA

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