



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

COASTAL RESOURCES MANAGEMENT COUNCIL

Oliver H. Stedman Government Center
4808 Tower Hill Road
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April 22, 1997

Mr. Philip S. Otis, PE
Northern Division, Environmental Division (Code 1823/PO)
Naval Facilities Engineering Command
10 Industrial Highway, Mail Stop 82
Lester, PA 19113-2090

RE: CRMC File Number 93-12-29 -- Allen Harbor Landfill, Proposed Remedial Plan,
Davisville, North Kingstown, RI.

Dear Mr. Otis:

Based on review of document entitled "Proposed Plan Site 09-Allen Harbor Landfill, Naval Construction Battalion Center, Davisville, Rhode Island," draft final, dated 2 August, 1996, and supporting documentation, it appears that the Navy's Proposed Remedial Alternative ("Alternative 3") is a feasible and implementable remedy to control the continued release of hazardous substances from the landfill. The determination to support "Alternative 3" versus the more extensive "Alternative 4" (multimedia cap with vertical barriers) is presumptive that additional groundwater sampling conducted during final plan design development renders inconclusive results regarding COC transport through groundwater migration. In the event that COC transport is linked to groundwater migration (predesign), or, that COC's continue to migrate to the Allen Harbor coastal zone upon completion of the cap and shoreline stabilization, the CRMC will consider additional remedial action necessary, including groundwater barriers.

The CRMC conceptually supports the additional components of "Alternative 3" subject to "federal consistency review" of the final design plan.

Additional design details associated with "Alternative 3," as discussed at the 3/14/97 site meeting, require resolution prior to final design approval. Specifically, the CRMC strongly supports the removal of contaminated shoreline sediments (the extent of which requires agreement), creation of shoreline wetland (with Allen Harbor entrance channel dredged material, if testing proves appropriate), and a continuous shoreline revetment at the landfill, constructed to

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the 100-year flood level (plus runup). (The revetment can be tapered to the height of the embankment where the bank elevation is less than the 100-year level.) Additionally, replacement of the damaged culvert at the southwest corner of the landfill, with a design which improves wetland circulation and flushing, is supported.

In conclusion, the CRMC conditionally supports the Navy's proposal alternative action, and looks forward to participating in review and approval of the remedial design plan.

Sincerely,



Kenneth W. Anderson, PE
CRMC Staff Engineer

KWA/lam

cc: G. Fugate, CRMC
D. Reis, CRMC
R. Gottlieb, RIDEM
C. Williams, USEPA