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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203-0001

May 27, 1997

Mr. Philip Otis
U.S. Department of the Navy
Northern Division - NAVFAC
10 Industrial Highway
Code 1811/PO - Mail Stop 82
Lester, PA 19113-2090

Re: EPA Comments on the Draft Record of Decision (ROD), Site 09-Allen Harbor Landfill, dated 27 January 1997, at the former Naval Construction Battalion Center (NCBC), Davisville, Rhode Island

Dear Mr. Otis:

Pursuant to § 7.6 of the NCBC Federal Facility Agreement (FFA), the Environmental Protection Agency (EPA) has reviewed the above-referenced document. EPA recognizes that the Navy has put considerable effort into the ROD presentation of the RI/FS study conclusions. EPA has only a few, but significant comments on the presentation. Please find our comments enclosed. EPA expects the Navy to respond in writing to these comments, IAW § 7.6 of the FFA, and to provide a revised draft redlined ROD for our review.

On July 31, 1996, EPA commented on the Navy's Sampling Strategy to start design of a long-term groundwater monitoring (LTM) plan. We continue to believe that the implementation of such a strategy will provide us with the needed baseline sediment and groundwater data to provide a framework for monitoring the effectiveness of the capping remedy. EPA has recently received a work plan from the Navy for installation of borings at the toe of the landfill to gather both engineering and chemical data for both the design of the cap and the LTM. EPA will be prepared to discuss the sampling plan comments during the week of June 16, 1997 so that the Navy can begin implementation this summer.

After the public meeting, EPA, Navy and RIDEM reviewed the transcript and agreed on several comments that EPA would respond to. I have enclosed my draft responses for discussion.

EPA New England looks forward to working with the Navy and RIDEM in the finalization of the ROD for this site. If you have any questions about this letter please call me at (617) 573-5736.

Sincerely,

Christine A.P. Williams
Remedial Project Manager
Federal Facilities Superfund Section

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Enclosures

cc: Richard Gottlieb, RIDEM
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George Horvat, Dynamac
Jim Shultz, EA Eng.

EPA review of Draft ROD for Site 9

1. Page 1, Declaration, Statement of Basis and Purpose, ¶2. Remove the first part of the sentence since EPA signs the ROD. Paragraph 2 should now read, "The Rhode Island Department of Environmental Management (RIDEM) concurs with the Navy and the United States Environmental Protection Agency's (EPA) remedial action decision for Site 09."

2. Page 1, Declaration. Reword 1st bullet to read: "Regrade the site and construct surface controls to minimize erosion and to promote proper runoff."

3. Page 1, Declaration. Reword 2nd bullet to read: "Construct a landfill cover consisting of multiple soil layers and two impermeable layers which meets the requirements of the Resource Conservation and Recovery Act (RCRA)."

4. Page 1, Declaration. Reword 3rd bullet to read: "Construct an appropriate landfill gas venting/management system including fencing around the manifolds."

5. Page 2, Declaration. Reword 4th bullet to read: "Remove landfill debris beyond the low water mark and place debris under cap and include under the cover the contaminated sediment above the low water mark."

6. Page 2, Declaration. Reword 5th bullet to read: "Restore or replace (1 for 1) impacted wetlands along the shoreline of the site as determined appropriate in design studies. Performance standards satisfactory to all trustees, will be developed during the design studies."

7. Page 2, Declaration. Reword 6th bullet to read: "Implement appropriate land use and groundwater use deed restrictions, install and maintain new warning signs to inform the public of the RIDEM ban on shellfishing in the harbor; and"

8. Page 2, Declaration. Reword 7th bullet to read: "Conduct long-term monitoring of landfill gas, groundwater, sediment, and shellfish quality to determine the effectiveness of the remedy. Performance standards satisfactory to the Navy, EPA and RIDEM will be developed during design studies. The environmental monitoring results and description of site activities will be provided in an annual report to USEPA and RIDEM and will be presented to the public at an annual informational meeting. If monitoring indicates that additional measures are needed to further contain contaminants additional remedial actions will be implemented as appropriate, such as vertical containment barriers."

9. Page 2, Declaration. Add an 8th bullet to read: "Conduct 5 year reviews with associated annual educational public meetings with presentations that would summarize site activities and the results of monitoring programs."

10. Page 2, Declaration Statement. Remove the paragraph and replace with the following:

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EPA review of Draft ROD for Site 9

> The selected remedy is protective of human health and the environment, complies with Federal and State requirements that are applicable or relevant and appropriate to the remedial action, and is cost-effective. This source control remedial action uses permanent solutions and alternative treatment technologies to the maximum extent practicable. The selected remedy does not satisfy the statutory preference for remedies that employ treatment that reduces toxicity, mobility, or volume as a principal element. The selected remedy will reduce mobility of contaminants through its containment features. Because this remedy will result in contaminants remain at the site above levels that allow unlimited use and unrestricted exposure, the Navy will review the remedial action to the extent required by law, including 5 year reviews pursuant to CERCLA, 42 U.S.C. 9621(c) Section 300.430(f)(4)(ii) of the NCP, to assure that it continues to protect human health and the environment.

11. Add, "U.S. Department of the Navy" above the signature line on the 1st signature page.

12. Add the sentence, "Concur and recommend for immediate implementation." at the end of the first sentence on the 2nd signature page.

13. Add, "U.S. Environmental Protection Agency" above the signature line on the 2nd signature page.

14. Page 3, Community Participation, ¶2. Reword the last sentence to read:

> The BRAC Cleanup Team (consisting of Navy, EPA and RIDEM representatives) has held periodic Technical Review Committee (TRC) and Restoration Advisory Board (RAB) meetings in order to update the community representatives and residents about the status of the Site 09 investigations on a bimonthly basis since 1989.

15. Page 4, IV. Scope and Role of Response Action, ¶1. Add a sentence to read: "Risks to terrestrial ecological receptors were reported to be moderate to high in the Allen Harbor Watershed."

16. Page 4, IV. Scope and Role of Response Action, ¶2, 3rd sentence. Add the information that the Multimedia Cap meets the requirements of RCRA, such as "Construction of an impermeable, multimedia cap which meets the requirements of RCRA subtitle C, at Site 09 will prevent human and terrestrial animal contact with site surface soil/fill material, reduce runoff and erosion of fill material, and prevent the potential leaching of COC from fill materials caused by precipitation infiltration."

17. Page 5, V. Summary of Site Characteristics, ¶3. The Phase II RI also included sediment sampling for the ERA. Add "sediment" to the list. The Phase III RI also included sediment,

porewater, fish and shell fish tissue samples for the ERA. Add, "sediment, porewater, fish and shell fish tissue" to the list.

18. Page 5, V. Summary of Site Characteristics, ¶4. The Phase I was conducted to start to define the nature and extent of contamination. Add the words, "start to" in the first sentence so that the sentence now reads, "The Phase I RI was conducted to start to define the nature and extent of COC in soil, groundwater and offsite shoreline sediment."

19. Page 5, V. Summary of Site Characteristics, ¶5. Change the second sentence to read: "Metals, PAHs, VOCs, pesticides and PCBs were detected at elevated levels in surface and subsurface soil samples collected throughout the site." (See tables 2-18, 2-19 and 2-21 in the Phase II RI.)

20. Page 6, V. Summary of Site Characteristics, ¶1. Change the first sentence to read, "Metals, pesticides and PAHs were detected in groundwater samples at or above health based levels." (See table 2-25 in the Phase II RI)

21. Page 6, V. Summary of Site Characteristics, ¶3. The Phase II and Phase III concentrations of VOC in the wells screened in the top of silt, sand and fill (Layer 1) indicate that the central and southeastern plumes are connected. VOCs in this layer were detected in elevated concentrations at MW 7, 19, 20 in the silt trough and at MW 6 & 21 along top of silt. Keeping in mind the radial groundwater flow these hits appear to be from the same plume. The same layer in the northern portion do appear to be isolated from the central and southeastern plume. The deep layers, bottom of silt, till and bedrock, appear to be isolated areas of contamination as indicated in the text. Remove the text within the parenthesis in the first sentence.

22. Page 6, V. Summary of Site Characteristics, ¶5. Remove this paragraph. As previously stated, EPA has serious concerns with the geostatistical analysis performed by the Navy and disagrees with the conclusions that there is no correlation between the groundwater concentrations of contaminants and the sediment contaminant concentrations. When performed correctly, the geostatistic analysis of the landfill and nearshore do show a direct correlation from the landfill contaminated groundwater to the nearshore environment. EPA can support the conclusions of the first full paragraph on page 7 and recommends leaving that paragraph without changes.

23. Page 7. Section VI. A. Include a sentence that list the receptors evaluated: workers, residents, recreational users. It should also be stated here that people are known to trespass on the site, but this was not evaluated since the other receptors evaluated would incur greater exposures.

24. Page 8, VI. Summary of Site Risks, ¶ 2. Add to Appendix C the tables from the RI, and

reference the tables in this paragraph, that present the summation of all risks from all exposure pathways.

25. Page 9, paragraph 2, sentence beginning, "The exposure pathways of concern for future recreational users are ....." Insert **shellfish consumption** as a pathway of concern.

26. Page 11, VI. Summary of Site Risks, ¶ 3. In comment 24 concerning Landfill Seep Exposures from EPA comment letter dated 4-3-96 on the DF ERA dated 2-15-96, EPA disagreed with the Navy's assertion that seep exposures were not a complete pathway. EPA continues to believe that the seep exposures are complete pathways to the ROCs. Re-word the first sentence to state, "Although 6 analytes were designated as COC in surface water in the Allen Harbor watershed, maximum concentrations of five of theses were found only at the landfill seep stations LANDS and LANDN (Figure 6)."

27. Page 12, VII. Development and Screening of Alternatives, bullet under Groundwater. The RAO should be changed to, "Reduce human exposure to groundwater;" since both the shallow and deep groundwater is contaminated and the capping will minimize the leachate generation and therefore exposure to groundwater that may occur both by drinking the water or by swimming in the harbor.

28. Page 14, VIII. Description of the Remedial Alternatives, list of remedial components included under alternatives 2-4. See previous comments from the Declaration.

29. Page 15, VIII. Description of the Remedial Alternatives, Alternative 3, ¶1, 4th sentence. EPA nots that the Navy used initial caps to make "Multimedia Cap" a defined term and we recommend that you continue the use of initial caps for the rest of the document.

30. Page 15, VIII. Description of the Remedial Alternatives, Alternative 3, ¶1, 4th sentence. Indicate that the cap will be constructed IAW RCRA, such as, "The Multimedia Cap will be designed and constructed to meet he requirements of RCRA Subtitle C and will minimize infiltration (thereby reducing the potential for COC to leach from the fill into groundwater), control surface runoff and erosion, and prevent human and terrestrial animal contact with fill materials."

31. Page 15, VIII. Description of the Remedial Alternatives, Alternative 3, ¶2, 1st sentence. For clarity change the first sentence to read, "Conceptually, the cap will consist either of a 12-inch bedding layer, a landfill gas vent layer a geomembrane liner or a flexible membrane liner, a compacted clay liner or a geocomposite clay liner, a 12-inch drainage layer, ..."

32. Page 16, VIII. Description of the Remedial Alternatives, Alternative 4, ¶1, 3rd sentence. Rewrite the 3rd sentence to read, "The multimedia cap would be the same as the one described in

Alternative 3 and is shown in Figure 8."

33. Page 17, IX. Summary of the Comparative Analysis of Alternatives, ¶1, 3rd sentence. Add the RCRA landfill citation, such as, "At municipal landfill sites, EPA's stated presumptive remedy is containment of site constituents, with or without additional remedial actions, based on site conditions, (*Presumptive Remedy for CERCLA Municipal Landfill Sites* OSWER Directive 9355.0-49FS).

34. Page 18, IX. Summary of the Comparative Analysis of Alternatives, first partial paragraph. Remove the last 2 sentences. See previous comments concerning the geostatistical report.

35. Page 18, IX. Summary of the Comparative Analysis of Alternatives, ¶2. Alternative 2 will not meet ARARs. Change the second sentence to read, "Alternative 2 will not meet federal and state ARARs."

36. Page 18, IX. Add a sentence to tie in the ARAR tables, such as, "The ARARs for the selected remedy and the actions to be taken to meet them are set forth in the tables in Appendix D."

37. Page 19, IX. Summary of the Comparative Analysis of Alternatives, 1st partial ¶. Add the following:

> "The double barrier beneath the soil cover in Alternatives 3 and 4 provides additional protection to the environment in reducing the erosion potential of the landfill waste, whereas there is no redundancy between the soil cover and the landfill waste in Alternative 2. Therefore, the Navy is confident that a Multimedia Cap can be constructed to overcome these potential problems."

38. Page 19, IX. Summary of the Comparative Analysis of Alternatives, ¶5. Remove the last sentence which discusses cost. This paragraph should compare the Alternatives only on the basis of the title of the section, "Reduction of Toxicity, Mobility, or Volume".

39. Page 19, IX. Summary of the Comparative Analysis of Alternatives, ¶5. Add the following to the end of the paragraph:

> "Capping under Alternative 3 will increase the amount of unsaturated waste that is above the water table by lowering the water table across the landfill by approximately seven feet. The capillary rise due to negative pressures under the cap is not expected to exceed this amount. The effect of the increase in salinity due to capillary action on waste previously saturated by groundwater will be minimal. Therefore, the effect on the contaminant loading from the groundwater to the sediments in the intertidal zone will also be minimal.

This assumption will be monitored during the long term monitoring of the site sediments and groundwater."

40. Page 21, IX. Summary of the Comparative Analysis of Alternatives, ¶3. The section on community acceptance must be updated after the comment period is complete.

41. Page 21, X. Selected Remedy, ¶1. Add a sentence to tie in the ARAR tables, such as, "The ARARs for the selected remedy and the actions to be taken to meet them are set forth in the tables in Appendix D."

42. Page 21, X. Selected Remedy. See previous comments on Alternative 3 in the declaration and section VII and make the appropriate changes.

43. Page 23, X. Add the following to site grading, landfill cover, gas venting/management system, revetment construction and wetland restoration, all of the bullets where engineering specifications will be determined the design phase: "Detailed plans will be developed during the alternative's design phase and submitted for regulatory agency review and concurrence."

44. Page 23, X. Add the following to the LTM bullet:

Annual reports which would include a description of site activities and a summary of results of environmental monitoring would be submitted annually to RIDEM and USEPA.

45. Page 23, X. Add the following to the 5 year review bullet:

Under CERCLA 121(c) remedial action (or lack thereof) that results in contaminants remaining on-site must be reviewed at least every five years. During five-year reviews, an assessment is made of whether the implemented remedy is protective of human health and the environment and whether the implementation of additional remedial action is appropriate.

The five-year site reviews for Alternative 3, will evaluate the alternative's effectiveness at reducing potential human health risk from exposure to groundwater and at preventing groundwater from contributing to Allen Harbor sediment contamination in excess of human health and ecological risk-based values. These evaluations will be based on how successful the alternative is at maintaining acceptable sediment levels (at or below ecological risk-based values) beyond the revetment in the newly created intertidal zone. Acceptable sediment levels would be based on NOAA effect range - medium (ER-M) toxicity criteria. These performance standards will be developed cooperatively with the Navy, EPA, RIDEM and the other trustees during the design studies.

Analytical data collected during RI (Phase I, Phase II and Phase III) and RD activities will be used to estimate the baseline conditions. The detailed approach would be developed during the design phase and submitted for regulatory agency review and concurrence.

46. Page 24, XI. Statutory Determinations, ¶1. Add the words, "and contaminated sediments" to the first sentence between the words, "...removing or covering landfill debris" and "...along the site shoreline", in line 5, to indicate that the Navy's intention that the contaminated sediments in the intertidal zone will be removed, covered by the revetment, or capped.

47. Page 25, XII. Documentation of No significant Changes. If during the comment period no substantive comments are received to create the need for changes to the proposed remedy, the following sentence should be included instead of the third sentence: "The final remedy selected , as described in this document does not differ significantly from the proposed plan." If the remedy does differ significantly, it should be so stated.

48. Page 2, Appendix C: Correction: The future construction worker scenario was not really based on the assumption of "multi-media cap". For consistency and clarify, please state in the text that the risk assessment was based on the assumption that some type of cap would be used because this is a landfill.

49. Page 3, Appendix C, ¶ 2. Change the second sentence to read, "Nevertheless, potential exposure to hypothetical residents consuming onsite groundwater as a source of drinking water was evaluated as a conservatively prudent measure to determine if groundwater use deed restrictions were necessary to implement as part of the remedy."

50. Page 5, Appendix C, Marine Ecological Risk Assessment Methodology. Remove the 3rd through the 5th sentences of the first paragraph. The summation of three Phases of the RAPS evaluated the overall health of Allen Harbor as compared to the Naragansett Bay. While this information was useful in building a data base from which to build on to integrate the Phase III RI-ERA, the methodology described in these sentences is not typically used in superfund ecological risk evaluations.

51. Appendix D. EPA notes that the Navy failed to make several changes to the tables contained in the Site 9 FS documents, (see EPA comments dated March 20, 1996 and September 4, 1996). Therefore the following changes need to be made to the tables in Appendix D.

A. Table D-1. Change the status of the 40 CFR 230 to relevant and appropriate, since the groundwater discharges to the surface water at this site.

B. Table D-3. Change the status of 40 CFR 121 to relevant and appropriate, since the groundwater discharges to the surface water at this site. Additionally change the action to

be taken to meet ARAR to read, "AWQC will be used to evaluate the performance of the remedy."

C. Table D-3. Change the action to be taken to meet ARAR for the final cover guidance to read, "Cap design will conform to these standards."

D. Table D-3, Clean Air Action Section 5, 160 through 169A. Change the status to applicable since the remedy will include gas venting.

E. Table D-3, LDR. Change the status to applicable, since there will be materials from the site placed on the landfill.

EPA Responses to Comments Received during Public Hearing Feb.6, 1997

1. Transcript, page 8, lines 5-11. Commentor requests clarification on presence of Landfill Leachate. The Marine Ecological Risk Assessment reports, most recent dated February 1996, provide a description of the toxicity and the ecological risks from the landfill leachate. EPA interprets the data gathered during the Remedial Investigation Study as indicating that the groundwater discharge to the nearshore environment is in the form of both intertidal and subtidal leachate. The reduction of infiltration from precipitation will reduce the production of leachate. The risks due to leachate only now are believed to be low in the intertidal zone. In the future after the landfill is capped, leachate should not continue to contaminate the intertidal zone. The subtidal leachate discharges are not currently showing any risks to human health and the environment. The Navy will monitor the effectiveness of the remedy and will implement appropriate remedial actions if needed at a later date. (The report the Commentor mentions (on line 5) is not included in the reference list attached to the transcript.)

2. Transcript, page 8 & 9, lines 23& 24 and 1-6. Commentor takes exception to the traditional risk assessment method as opposed to an approach that would involve comparing the Superfund site to other locations. As required by the National Contingency Plan 40 CFR § 300.430(d)(4), EPA must protect against human health and the environmental risks associated with hazardous waste disposal site contaminants. Using quantitative risk assessment methodology, EPA evaluates potential human and ecological exposures to chemicals released or accumulated in environmental media such as groundwater, soil, air, surface water, sediment, and biota. Baseline risk assessments are used to determine the level of cleanup required to protect human health and the environment.

3. Transcript, page 10, lines 23& 24. The Commentor expresses the opinion that arsenic in shellfish is not a public health concern because it is primarily in the organic form, whereas inorganic arsenic is associated with cancer effects. The National Toxics Rule applies to the development of ambient water quality criteria, for which individual site-related factors are usually considered. For more information on arsenic in the environment, EPA recommends additional references be consulted, such as the Toxicological Profile for Arsenic prepared by the Agency for Toxic Substances and Disease Registry (ATSDR).

Although the forms of arsenic in environmental samples vary and may predominantly be organic arsenic in fish tissue, the arsenic form in shellfish at this site has not been speciated. The information in the administrative record does not identify the form of arsenic found at the site.

The Commentor implies that organic forms of arsenic are not a public health concern. EPA notes that toxicity in humans can occur from exposures to inorganic <u>and</u> organic forms of arsenic. Regarding the toxicity of inorganic and organic arsenic, EPA has developed oral toxicity values for ingested arsenic for both cancer and noncancer effects. The cancer slope factor is based on carcinogenic effects associated with ingested <u>inorganic</u> forms of arsenic. An oral reference dose, derived for non-carcinogenic effects, was developed by EPA to protect against dermal toxicity

Enclosure 2

and possible vascular complications associated with ingestion of organic forms of arsenic. Without site-specific speciation data for arsenic, EPA uses both the cancer and noncancer toxicity values to estimate human health risks.

EPA recognizes that there are differences in scientific opinions on the toxicological database for arsenic. EPA, with the National Academy of Sciences/National Research Council, established a national task force to review the entire health effects database for arsenic. This review began in March 1997. This summer, the EPA will convene an expert panel to review the carcinogenic and genotoxic effects of arsenic. EPA Headquarters estimates that minor changes may be reflected on EPA's toxicity database (Integrated Risk Information System) later in 1997.

4. Transcript, page 15, lines 2-14. The Commentor requested clarification on the issue of whether the installation of a RCRA Subtitle C landfill cap over the Allen Harbor landfill increase saltwater intrusion, and if so, what are the expected impacts of this saltwater intrusion. The installation of a RCRA Subtitle C landfill cap will significantly reduce groundwater recharge from infiltration of precipitation at the landfill surface. Therefore, it is expected that saltwater intrusion will increase as a result of the elimination of the freshwater infiltration from the landfill surface, the extent to which has not fully been determined. However, there are benefits associated with the construction of a RCRA C landfill cap which reduce the risks posed by the landfill to the groundwater and Allen Harbor and minimize the potential detrimental impact of increased saltwater intrusion. These benefits are discussed below:

A. Recent measurements taken during the remedial investigations indicate that, within the landfill, there is an approximately 7-foot groundwater mound (freshwater) from the mean sea water elevation. It is expected that this fresh groundwater mound will essentially disappear when the RCRA Subtitle C Cap is constructed as a result of elimination of recharge from the landfill surface. This reduction in the groundwater mound (lowering of the water table) thereby reduces the leachate from waste which is currently located within the mounded zone. Furthermore, considering the fact that significant portions of the waste (approximately 75% of pollutant) lie above the current water table (see recent remedial investigation report), the proposed landfill cap will significantly reduce the pollutant leachate (washout) from the landfill by cutting off the freshwater infiltration.

B. The reduction of infiltration from precipitation due to the construction of a RCRA Subtitle C cap decreases the hydraulic gradient in both a vertical and horizontal direction thereby reducing the mass flux of contaminants to Allen Harbor. Consequently, it is expected that the landfill cap will increase the time it takes contaminants to reach the harbor. In addition to reducing the mass flux of contaminants to the harbor, an added benefit to increasing the time it takes contaminants to reach the harbor is that it allows potentially intrinsic natural biological processes more time to be in contact with site contaminants. The presence or absence of conditions amenable to these biological processes have not been evaluated at

this site, either qualitatively or quantitatively.

C. The primary concern associated with saltwater intrusion is the fact that corrosivity is significantly increased within a saltwater environment compared to a freshwater environment. A consequence of this property is that intact metallic containers will corrode faster in this environment and, if filled with waste, release its contents to the surrounding media. While background information indicates the possibility of intact drums being present in the landfill, previous investigations conducted at the site which included the construction of 9 test pits with depths reaching 26 feet below ground surface only encountered 1 intact drum. While these studies do not rule out the presence of large numbers of intact drums, neither do they support the conclusion that large quantities of intact drums remain in the landfill.

In summary, while it is agreed that saltwater intrusion will increase minimally at the site as a result of the placement of a RCRA Subtitle C cap, the potential detriments associated with this occurrence are far outweighed by the benefits of the placement of a RCRA Subtitle C cap as highlighted above.

5. Transcript page 16, lines 3-8. The Commentor requests clarification as the status of the Navy's responses to EPA's comments on the RI/FS for the Site and suggests erosion control and long term monitoring as an alternative remedy. The EPA has stated in the Site correspondence that the technical issues of disagreement revolve around the significance of the contribution of groundwater contaminants to the sediment contamination at the toe of the landfill. EPA maintains that there are some groundwater contaminants leaching into the near shore sediments under current conditions at the Site. The construction of an impermeable cap will reduce the rainwater infiltration through the waste and therefore will reduce the amount of contamination leaching from the landfill. The construction of an impermeable cap will also eliminate erosion and therefore protect the nearshore environment from further significant contamination. The design of the required long term monitoring plan will provide data in the harbor to identify the long term monitoring sampling locations, that will be used to determine the protectiveness of the remedy. The specific comments made during the last iteration of the RI/FS, August/September 1996, dealt mostly with the editorial comments made by the Navy to reduce the significance of the groundwater/leachate contribution. (See EPA comment letters dated August and September 1996). EPA decided that the record was technically complete to justify the proposal of an impermeable cap, even though some editorial disagreements were still outstanding. Navy, EPA and RIDEM agree that Alternative 3 provides the best remedy on balance for the protection of human health and the environment at the Site.