



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

April 26, 1993

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

Re: Draft Proposed Plan Site 12 - Building 316 DPDO Transformer Oil
Spill Area, Site 14 - Building 38 Transformer Oil Leak, Naval
Construction Battalion Center, RI

Dear Ms. Powers:

Pursuant to § 7.6(f) of the NCBC Federal Facility Agreement (FFA),
please find attached the Environmental Protection Agency's (EPA)
comments on the above referenced document.

As with the Risk Assessment Technical Memorandum for Sites 12 & 14,
EPA provided the enclosed comments on the Proposed Plan to the
Navy's IRP contractor, TRC Environmental Corporation via electronic
facsimile on April 15, 1993.

If you have any questions with regard to this letter, please
contact me at (617) 573-5783.

Sincerely,

A handwritten signature in cursive script that reads "Michael J. Daly".

Michael J. Daly
Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: Jeff Crawford, RIDEM
Lou Fayan, NCBC
EPA Technical Team



ATTACHMENT A

GENERAL COMMENTS

1. All references to specific dates concerning public comment periods and public meetings will need to be adjusted after further coordination between the Navy, RIDEM, and EPA.

SPECIFIC COMMENTS

2. Page 1, ¶1: The last sentence should be revised to include, "...through Defense Environmental Restoration Account or the Base Realignment and Closure Account".
3. Page 1, ¶ 3 "...followed by off-site disposal or incineration.": Please clarify in the text that incineration will be off-site. This paragraph should be further revised to clarify why the preferred alternative includes a off-site incineration component. Otherwise this will cause confusion when the public provides its comments on the preferred alternative.
4. Page 2, item #4: Please change "FS" to ISA.
5. Page 2, Section 2.2 "...the public is invited to review...": Please append this sentence with other significant sources of information related to Sites 12 and 14 (i.e. risk assessment technical memo, removal reports, etc.).
6. Page 7, Section 5.0: The site-specific cleanup levels that will meet the remedial response objectives should be presented in this section.
7. Page 7, Section 6.0: Additional text should be added to explain the Navy's rationale for progressing from the Initial Screening of Alternatives stage of the FS process and presenting a Proposed Plan for the cleanup of Sites 12 and 14.
8. Page 8, ¶1: Please clarify the first sentence regarding the off-site disposal or off-site incineration of PCB contaminated materials under the preferred alternative.
9. Page 10, Section 8.2: This section should include some additional text mentioning site-specific ARARS. Please refer to Attachment B of this comment letter for an example of additional text to be included.
10. Pages 14, Glossary: Please add the following phrase at the end of the definition for ROD - "...and community concerns in the Responsiveness Summary".

the HELP model demonstrates that the existing cover on the older cells reduces infiltration by 65 percent, the proposed remedial action would provide similar groundwater protection as Alternative 3, which would provide a conventional low-permeability cover system on the 1947, 1951, and 1957 cells. Alternative 1, the minimal no-action alternative, would not include any measure to reduce contaminant leaching to groundwater from the three newer cells, which appear to be the source of groundwater contamination; therefore, it would not protect human health or the environment.

8.2 COMPLIANCE WITH APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS

The compliance with **Applicable or Relevant and Appropriate Requirements (ARARs)** criterion addresses whether a remedy complies with all state and federal environmental and human health laws and requirements that apply or are relevant and appropriate to the conditions and remedial options at a specific site. If an ARAR cannot be met, the analysis of the alternative must provide the grounds for invoking a statutory waiver or variance.

The proposed remedial action would meet the **Resource Conservation and Recovery Act (RCRA)** Subtitle C closure/post-closure action-specific ARAR for alternate closure. To meet the Massachusetts Solid Waste Management action-specific ARAR for the 1947, 1951, and 1957 cells, approval of an alternate final cover system would be required pursuant to 310 CMR 19.113. Both ARARs would be met for the 1970 Cell, Post-1970 Cell, and Kettle Hole with this alternative.

The minimal no-action alternative would achieve the same level of ARAR protection as the proposed remedial action for the 1947, 1951, and 1957 cells. It would not meet RCRA or Massachusetts requirements at the 1970 Cell, Post-1970 Cell, or Kettle Hole.

Covering all AOC LF-1 cells would meet RCRA closure/post-closure containment requirements and Massachusetts Solid Waste Management action-specific ARARs at all AOC LF-1 waste disposal areas. Further discussion of ARARs can be found in the AOC LF-1 FFS report (ABB Environmental Services, Inc., 1992).