

N62578.AR.000125
NCBC DAVISVILLE
5090.3a

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

DIVISION OF AIR AND HAZARDOUS MATERIALS

291 Promenade Street
Providence, R.I. 02908-5767

24 June 1992

Mark E. Krivansky
Remedial Project Manager
Department of the Navy
Northern Division
Naval Facility Engineering Command
Building 77L, U.S. Naval Base
Philadelphia, PA 19112-5094

RE: Letter of 18 June 1992
Navy Response to RIDEM comments on Final Scope of Service
for Creosote Dip Tank, NCBC-Davisville
N62472-91-C-0030

Dear Mark:

The Division has reviewed your letter of response to this Division's comment letter of 29 April 1992. At this time, the Division has the following comments to the Navy's responses:

1. Navy Response #1- Any specifications cited in this document which are not applicable to this specific job should have been deleted from this specific scope of service.
2. Navy Response #2- RIDEM comment #5 is correct. As you can see by the attached copies of the Scope of Service, Paragraphs 1.3.1.4 and 1.3.1.5 relate specifically to Waste Profile Sheet and Shipment of Waste respectfully. There is no specific reference to the Navy retaining "title" to all hazardous waste materials generated. The document should have clarified that in section 1.4.

If you have any questions, please call me at (401) 277-2797.

Sincerely,



Jeffrey Crawford
Senior Engineer

cc: W. Angell

Telecommunication Device for the Deaf 277-6800
Fax Number 277-2017

REMOVAL OF CREOSOTE DIP TANK, NCEC, DAVISVILLE, R.I.

04910030

the stainless steel tank, confining and collecting decontamination materials and wastes as well as the disposal of those materials. Include drawings illustrating decontamination area layout as well as catalog cuts of the equipment to be utilized.

- f. Provisions to confine and control traffic flow in and around the work area so as to minimize the potential for contamination migration.
- g. Spill prevention, containment, and cleanup contingency measures to be implemented.
- h. Implementation plan and schedule for waste removal and disposal.
- i. Provisions for the temporary storage of hazardous materials if temporary storage beyond 90 days is required.

1.3.1.2 Hazardous Waste Permits

As required under "Hazardous Waste Plan" submit copies of EPA, state and local hazardous waste permits and EPA and state Identification numbers of the transporter, treatment and disposal facility that will be accepting hazardous waste. Include the facility location and a 24-hour point of contact.

1.3.1.3 Regulatory Requirements

- a. Obtain permits required to comply with local, state, and Federal regulations.
- b. Hazardous wastes, such as soil, debris, water, sediment, and sludge, shall be packaged, labeled, stored, transported, treated and disposed of in accordance with Federal, State and local regulations to include 40 CFR 260, 40 CFR 261, 40 CFR 262, 40 CFR 263, 40 CFR 264, 40 CFR 265, 40 CFR 266, and RIGL Chapter 23-19.1. Transporters, sorters, treaters and disposers must be certified and have EPA ID numbers. Payment for disposal of hazardous waste will not be made until completed hazardous waste manifest from the treatment or disposal facility is returned, and a copy furnished to the Government.

1.3.1.4 Waste Profile Sheet

As required in the paragraph titled "Characterization of Wastes," Waste Profile Sheets shall be submitted to the Contracting Officer prior to the disposal of any hazardous wastes.

1.3.1.5 Shipment Manifest

Shipment Manifests shall be provided to the Contracting Officer as required by the paragraph titled, "Disposal Hazardous of Wastes."

REMOVAL OF CREOSOTE DIP TANK, NCBC, DAVISVILLE, R.I.

04910030

1.3.1.6 Delivery Manifest

Delivery Manifests shall be provided to the Contracting Officer as required by the paragraph titled, "Disposal Hazardous of Wastes."

1.4 TITLE TO MATERIALS

All materials resulting from removal action work, except as specified otherwise, shall become the property of the Contractor and shall be disposed of as specified in applicable local, state, and federal regulations and herein.

PART 2 PRODUCTS

Not used.

PART 3 EXECUTION

3.1 HANDLING AND DISPOSAL OF WASTES

All residual materials, soil and debris, substances, or materials requiring disposal shall be stored, contained, transported and disposed of in accordance with applicable Federal, state and local hazardous waste regulations. Federal regulations are contained in the Code of Federal Regulations 40 CFR 260, 40 CFR 261, 40 CFR 262, 40 CFR 263, 40 CFR 264, 40 CFR 265 and 40 CFR 266. The Contractor shall:

- a. Obtain all required permits.
- b. Provide all required containers, vehicles, equipment, labor, signs, labels, and manifests.
- c. Report spills of hazardous waste immediately to the Contracting Officer and take immediate effective containment and cleanup actions as required.

3.1.1 Characterization of Wastes

Prior to the removal of any waste, the Contractor shall have the waste characterized by a qualified independent testing laboratory, using the criteria established by 40 CFR 261 and the Rhode Island Department of Environmental Management Division of Air and Hazardous Materials, Hazardous Waste Regulations. The characterization shall also meet the requirements of the disposal facility which is to receive the waste. A copy of the test results, a Waste Profile Sheet, shall be submitted to the Contracting Officer prior to the final disposal of the wastes.

3.1.2 Storage of Wastes

3.1.2.1 Temporary Storage

Temporary hazardous materials storage facilities must conform to Federal and state regulations and provide for preventing wind erosion of the waste, preventing stormwater from running onto the wastes, and either preventing stormwater runoff from the wastes or the collection and treatment of