



DEPARTMENT OF THE NAVY
NORTHERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
PHILADELPHIA PENNSYLVANIA 19112-5094

IN REPLY REFER TO

6280
Ser 3612/1421/JPV
FEB 7 1989

Richard A. Sherman, Esq.
Tillinghast, Collins & Graham
On Old Stone Square
Providence, RI 02903

Dear Mr. Sherman:

The following are responses to your observations regarding the NETC Newport, RI Draft Remedial Investigation/Feasibility Study (RI/FS) Work Plan prepared by TRC-Environmental Consultants for Northern Division, Naval Facilities Engineering Command per your letter of 7 December 1988.

1. Rhode Island Department of Environmental Management and the U.S. Environmental Protection Agency have been given copies of the Draft RI/FS Work Plan and have been requested to forward comments via the Technical Review Committee which meets regularly. Melville Marine Industries is represented at the TRC meetings and receives copies of all comments and responses prior to finalization of the Work Plan.

2. No other areas of known dumping have been documented by the Initial Assessment Study nor the Confirmation Study. Sites No. 5 (Melville North Area) and No. 6 (STP Sludge Drying Bed) have already been cleaned up by the Navy. An unspecified number of additional unmarked drums have been identified by MMI during a TRC meeting and on 10 January 1989 the Navy and TRC-ECI met with MMI to discuss a technically acceptable approach to investigate this area. NETC Newport will sample the contents of the drums to determine if they contain hazardous wastes. After the contents and possible source are identified, potential removal alternatives will be discussed at a future TRC meeting. Drum removal may be possible during the proposed oily-sand pile removal anticipated this year.

Also, TRC-ECI will perform a visual inspection during the RI fieldwork to select locations for surface soil sampling in the area between the wetlands north of Melville North Landfill and the currently developed MMI industrial area. This preliminary site inspection will determine if additional fieldwork is justified there.

Site No. 2 (Melville North Landfill) is not the only site proposed for development. Naval Underwater Systems Center, Newport is considering Site No. 1 (McAllister Point Landfill) for a facility location.

3. The USEPA guideline for RI/FS allows 18 to 24 months for completion. The possibility of scheduling Site No. 2 (Melville North Landfill) first for fieldwork and sample analyses was discussed at the last TRC meeting. However, prioritizing Site No. 2 to the extent of delaying work at other sites is not likely at this time. As data from the first round of sampling analyses are available reevaluation may be considered relative to priority of sites.

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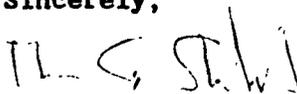
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The Navy did not abandon the Initial Assessment Study nor the Confirmation Study and is currently following the guidelines of CERCLA and SARA as instructed by the Navy Installation Restoration Program. The schedule is consistent with private Superfund sites and could not be accelerated while still meeting all State and Federal requirements.

Reimbursement for expenses incurred in identification and removal of hazardous wastes by MMI will not be discussed by the TRC as it was organized to address strictly technical aspects of the Installation Restoration Program. The issue of reimbursement has been forwarded to the Office of C uns 1 at Northern Division.

Sincerely,



T.G. SHECKELS
Head, Restoration Management Section
By direction of the Commanding Officer

Copy to:
MMI, Dean Coker
TRC-ECI, Robert Smith
NETC Newport, Rachel Marino
NORTHNAVFACENCOM, Frank Lewis

