



DEPARTMENT OF THE NAVY
NAVAL EDUCATION AND TRAINING CENTER
NEWPORT, RHODE ISLAND 02841-5000

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NAVSTA NEWPORT RI
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5090 IN REPLY REFER TO.
Ser 739/424E

! 3 OCT 1989

State of Rhode Island
Department of Environmental Management
Division of Air and Hazardous Materials
ATTN: Ms. Cynthia Gianfrancesco
291 Promenade Street
Providence, RI 02908-5657

Dear Ms. Gianfrancesco:

In response to your Letter of Deficiency issued to the Naval Education and Training Center (NETC), Newport, by your letter of 29 August, we offer the following:

Deficiency #1: Failure to ensure that all NETC personnel complete an annual training program.

Order A: Submit documentation that all personnel have received the required training, including training within six months for new personnel, and annual reviews for old personnel.

Action: Training was given to personnel on 27 September 1989 to reiterate previous on-the-job training that had not been documented. A copy of the updated training records are provided in enclosure (1). It is noted, however, that the format used by NETC for personnel training records had been previously approved by Mr. James McCaughey of your office in his letter dated 14 October 1987, copy attached as enclosure (2). If upon further review you want us to change the format, please so advise us.

Deficiency #2: Failure to comply with permit conditions, specifically, permanent closure of Tanks No. 53 and 56 in Tank Farm 5 in 1988, as stated in Section VI, Contingency Plan and Emergency Procedures, of the Rhode Island Hazardous Waste Facility Part B Permit.

Order B: Immediately begin compliance with the schedule stated in your Letter of Deficiency.

Action: We agree that these tanks should be permanently closed. It is our intention to close these tanks, as well as the other tanks in Tank Farm 5, as soon as possible. Unfortunately, budget and technical constraints make it impossible for us to comply with the schedule outlined in your Letter of Deficiency. We have, however, taken steps to accelerate funding for this work and anticipate that we could achieve the following:

1. Data to obtain permits for the discharge of the water layer of the tank contents. It is our intention to discharge the pretreated water to Narragansett Bay. In accordance with our tank closure plan, the counter-current aeration stripping process concept has been developed and will be included as part of our discharge permit application. Our applications to RIDEM Division of Water Resources and RI Coastal Resource Management are expected to be submitted by 13 December 1989, as soon as our consultant provides us with additional information pertaining to discharge rates.
2. Determination of non-hazardous wall contamination. We have a consultant under contract to develop the method that will be used to determine that the walls are clean and non-hazardous. We expect to be able to submit our proposed testing method to you by 12 January 1990.
3. Groundwater monitoring and sampling plan. Our same consultant will also prepare the groundwater monitoring and sampling plan. We expect to be able to submit their description to you by 12 January 1990.
4. Preparation of final plans and specifications. These documents will be prepared by our consultant, and we would expect to be able to submit them to you by 31 August 1990.
5. Removal of tank contents; tank cleaning and demolition. Approximately \$2 million will be required to accomplish this effort. Your Letter of Deficiency has been forwarded to higher headquarters for budgeting considerations. We envision that these funds will be provided to us late in calendar year 1990. Award of the contract for execution of these tasks will occur soon thereafter and before 31 December 1990. Details of procedures for removal of the tank contents will be submitted after the contract has been awarded, but prior to the commencement of work. Selection of hazardous waste transporters and disposal facilities to meet the Navy's specifications will be the prerogative of the Navy's Contractor. Once the Contractor has made his selection and after it has been approved by the Navy, the information will be forwarded to you. It is expected that it will take approximately 18 months to achieve all of these tasks; therefore, complete closure of the tanks should be accomplished by the second quarter of the calendar year 1992.
6. Groundwater remediation. Your letter of 7 July 1989 indicates the Navy may request to postpone the groundwater remediation at Tanks No. 53 and 56 until a comprehensive groundwater remediation program for the entire Tank Farm is designed under the Installation Restoration Program (IR). Therefore, due to technical and economic considerations, we request to defer groundwater remediation measures until the Remedial Investigation/Feasibility Study phase of the IR is completed, which is currently scheduled for study completion by late 1993.

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To preclude the issuance of a Notice of Violation, we request an extension of time in order to complete closure in accordance with the above schedule, which is the most expeditious schedule practicable and feasible within Federal procurement, budgetary and technical constraints. However, we also wish to discuss further whether or not the closure of these tanks is a condition of our Hazardous Waste Facility Permit.

We would like to emphasize that it is our sincere desire to amicably resolve this matter by closure of the tanks straightway. Toward this end, we would like to meet with you to discuss and resolve any apparent or real differences. Our point of contact is Ms. Rachel Marino at 841-3735.

Sincerely,



W. F. BURKE
Captain, CEC, USN
Director for Public Works
By direction of the Commander

Enclosures:

- (1) NETC Personnel Training Records
- (2) RIDEM letter of 14 October 1987

Copy to:

EPA Region I (Mr. Frank Battaglia)
CNET
NORTHNAVFACENGCOM (Code 141)
OJAG (Code 34)