



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

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

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NAVSTA NEWPORT RI
5090 3a

February 10, 1997

James Shafer, Remedial Project Manager
U.S. Department of the Navy
Naval Facilities Engineering Command
Northern Division
10 Industrial Highway
Code 1823, Mail Stop 82
Lester, PA 19113-2090

Re: Schedules in the Federal Facilities Agreement for the Naval Education and Training Center

Dear Mr. Shafer:

Thank you for your letter dated January 28, 1997 concerning the deadlines set forth in the Federal Facilities Agreement ("FFA") for the Naval Education and Training Center ("NETC"). I understand that your proposed schedule is based upon the regulatory review times established in the FFA. As you know, however, this does not preclude us from aspiring toward the more efficient "working schedules" that the Navy, EPA, and the Rhode Island Department of Environmental Management ("RIDEM") have developed at our monthly remedial project manager's meetings. Although much of your proposed schedule appears consistent with the FFA, I am unable to concur with the entire schedule provided in your letter.

First, the site schedule needs to include the Old Fire Fighter Training Area schedule. I understand that a work plan for a removal action at this site is forthcoming and that this removal action could affect future investigations at the site. However, it is necessary to specify plans for future studies at this site in the FFA.

Second, enforceable dates for future investigations for the Offshore component of Derricks Shipyard must also be specified. I understand that the ecological risk assessment will be sent on February 12, 1997. We should discuss what additional investigations are necessary at this site.

Third, you may wish to reference any ongoing work at Tank Farms 1, 2, and 3 that is being conducted under the RCRA or Underground Storage Tank programs. Clearly, this could affect future assessments under CERCLA and could help justify the protracted cleanup schedule. Likewise, removal actions taken at the NUWC Disposal Area and the Coddington Cove Rubble Fill Area should also be referenced (e.g., by a footnote).

I am eager to work with you and the RIDEM to finalize an FFA schedule for NETC. In the meantime, I recommend that we finalize the parts of the proposed FFA schedule not mentioned



above. Can we discuss specific plans for the Old Fire Fighter Training Area and the Offshore component of Derecktor Shipyard at our February 19, 1997 meeting? Please do not hesitate to contact me at (617) 573-5777 should you have any questions before this meeting.

Sincerely,



Kimberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

cc: Paul Kulpa, RIDEM, Providence, RI
Brad Wheeler, NETC, Newport, RI
Bob DiBiccaro, USEPA, Boston, MA
Mary Sanderson, USEPA, Boston, MA