



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

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July 29, 2002

Al Haring, Director
Environmental Restoration Division
U.S. Department of the Navy
Naval Facilities Engineering Command
Northern Division
10 Industrial Highway
Code 1823, Mail Stop 82
Lester, PA 19113-2090

Dear Mr. Haring:

Thank you for your letter dated July 17, 2002 where you expressed interest in remediating the tank Farms at the Naval Education and Training Center Superfund Site under the *Rhode Island Regulations for Underground Storage Facilities Used for Petroleum Products and Hazardous Materials*. EPA encourages interim actions at IRP sites when such actions are consistent with the CERCLA remedy. Often such actions lead to more efficient overall site cleanups.

The Navy, EPA and RIDEM RPMs have previously discussed the possibility of removing the Tank Farm sites from the FFA and decided against this. There is disagreement regarding whether these sites are exclusively petroleum sites. The groundwater may be contaminated, sludge pits may be present on site, waste oils or solvents could have been disposed at the sites, and it is possible that other contaminants could be mingled with the petroleum contamination. EPA has further learned that there are several areas of potential contamination within the tank farms that contain CERCLA wastes. These areas include burning pits, electrical switch houses that may contain PCB transformers, ethyl blending plants, bottom sludge and water reclamation plants, and holding tanks within fuel loading areas. It is EPA's understanding that for these reasons the Navy voluntarily agreed to address the Tank Farms under the Superfund program. Certainly, cleanup under the State's UST program may be beneficial to and consistent with the overall site remedy under CERCLA, but there is not enough site environmental information to definitively decide whether such actions will address all of the site contamination. EPA believes that - at a minimum - a site investigation is required to address data gaps at the Tank Farms before we can collectively discuss the appropriateness of removing these sites from the CERCLA process (*i.e.*, FFA) via a No Further Action under CERCLA ROD.

Since the FFA was finalized in 1992, the only Superfund investigations that have been performed at the Tank Farms are for Tanks 53 and 56 within Tank Farm 5. Our most recent FFA schedule indicates that a draft SI Work Plan will be sent to our office on February 13, 2004. EPA looks forward to reviewing the upcoming SI work plans for these sites. As with other Superfund sites, if the site data and risk assessments indicate that site risks are acceptable, a No Further Action

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ROD may be issued. EPA believes that it is important to maintain clarity and transparency in its decision-making and Administrative Records for Superfund sites.

EPA understands that there are currently several development interests for the Tank Farm property. EPA has not received any detailed information regarding the proposal to install a golf course at Tank Farms 2, 3, and 4. I understand that the RPMs from the Navy, EPA and RIDEM (along with community support) jointly established site cleanup priorities for Newport several years ago. The jointly approved cleanup approach was to address the most contaminated sites first. This approach continues to be supported by EPA. The Tank Farms were among the last of the sites to be cleaned up, with SIs currently planned for 2005 according to the FFA. EPA believes that OFFTA, Derecktor Shipyard, and Gould Island must remain as site cleanup priorities and that any environmental work at the Tank Farms must not affect the cleanup schedules at these sites (either by protracting the schedules or reducing available resources).

EPA would like to arrange a meeting to talk with the Navy about these issues and others. Please contact me at (617) 918-1431 to schedule the meeting and discuss the draft agenda.

Sincerely,



Dennis Gagne, Chief
Federal Facilities Superfund Section

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