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PROPOSED PLAN FOR THE McALLISTER POINT LANDFILL

OPERABLE UNIT FOR SOURCE CONTROL

NEWPORT EDUCATION AND TRAINING CENTER

SUPERFUND SITE

Based upon the information available at this time, the Department of Environmental Management (DEM) tentatively concurs with the remedy as proposed by the Navy for Operable Unit 1 of the McAllister Point Landfill.

The Department has been actively involved in all stages of the review process for the McAllister Point Landfill Site, including the investigation of this operable unit. Department personnel have conducted a thorough review of the Phase I Remedial Investigation (RI) and Focused Feasibility Study (FFS), as well as other technical documents generated including the Proposed Plan.

As a result of this review of the Proposed Plan, the State will be providing a written comment letter to the Navy that includes, in detail, all remaining concerns the State has regarding the preferred alternative. This evening I would like to outline some of those

concerns, as well as our points of agreement with the Navy.

The State supports the concept of installing a multilayered cap at the McAllister Point Landfill for source control. However, due to the nature of the site, and the fact that a Phase II Remedial Investigation has not been conducted at the site, the State feels that the following information must be obtained as it will affect the proposed remedy:

1. The landfill is located adjacent to Narragansett Bay and is subject to tidal influences and wave actions. The State will recommend that these conditions be taken into account when the Navy conducts their leachate generation study. In addition, tidal influences and wave actions may have a bearing on any potential hot spots located at the site.
2. The State is concerned about the potential for hot spots to be present at the site. The State will recommend increasing the area covered by the soil gas survey and the conductance of a comprehensive investigation for Non Aqueous Phase Liquids (NAPLs) at the site.
3. The State concurs with the Navy's current sampling event which will aid in characterizing the sediments and biota adjacent to the site. The results of this sampling effort will be evaluated in the assessment of the ecological impacts and determine whether the sediments require remediation. However, the State is concerned that if sediments are found to be contaminated that the

appropriate investigations to determine the extent of contamination will not be done in time to allow for the placement of these sediments under the cap.

As previously stated, the State supports the proposal to install a multilayer cap at the site for source control. However, due to the location of the site, the State does have a number of concerns with respect to the actual design of the proposed cap.

1. Currently, it is believed that a portion of the site lies within the flood plain of the bay. In addition, the cap will be exposed to flooding and wave action resulting from hurricanes and other storm events. The Navy has proposed performing a modeling study on the site to optimize cap design for storm events. The State has made a number of additional suggestions on ways to improve the cap design. The State has also proposed that the Navy investigate cap construction efforts for other sites located adjacent to large surface water bodies as well as the practices require at other coastal states. The State believes that this effort will be cost effective and will prove to be beneficial.
2. A second concern is that in order to achieve the desired slopes at the landfill, either the existing slopes will have to be cut back or portions of the shoreline and potentially the bay will have to be filled in. The State has recommended that the Navy make every effort to avoid filling in the bay in order to achieve the desired slopes.

3. **As indicated by the Navy, landfill gas control will probably be initiated at the site. The State has recommended that the Navy investigate the potential to place the gas extraction wells in areas of known hot spots. These wells would then serve two functions: (1) collect landfill gases, (2) remove contaminants from the site through vapor extraction.**

Finally, the State feels that both the State Solid Waste Regulations and the State Groundwater Regulations apply to the site. The Solid Waste Regulations may be considered to be more stringent than the requirements listed under RCRA Subtitle C under certain interpretations. The Groundwater Regulations have Preventive Action Limits which are stricter than Federal Maximum Contaminant Levels and allow for action to be taken at an earlier stage. The State will recommend that both of these regulations be included in the Proposed Plan for the site.

In conclusion, we believe these issues must be addressed as they will affect remedial alternatives for Operable Unit 1, Source Control, and Operable Unit 2, Management of Migration. Construction of the cap must by law commence within fifteen months of ROD signature. Possible remedial alternatives for this site, such as, the pumping and treating of groundwater beneath the site, the excavation or remediation of hot spots at the site, and the potential placement of contaminated sediments beneath the cap obviously will both be affected and effect the design of the cap. Therefore, it is critical that these investigations be conducted in a timely manner so that appropriate remedial measures can be taken. Currently, the Navy is behind in the schedule for these investigations, however they have

indicated that they will make every effort to provide the regulatory community with the appropriate information on time.

Furthermore, since these investigations are crucial to both Operable Unit 1 and 2 the State will recommend that language will be included in the ROD to address these issues.

Although the Department of Environmental Management would like to see an expedited remedy chosen for the site, we believe that these concerns should be addressed in the Proposed Plan prior to finalization.

Finally, the State views the forthcoming Record of Decision as a significant milestone in moving towards a comprehensive, whole site remedy for the McAllister Point Landfill. In addition, there are at least two other Naval landfills adjacent to the bay which are scheduled for remedial action. Efforts undertaken at the McAllister Point landfill will surely prove to be useful for the remedial actions taken at those sites.

That concludes what we consider to be our major concerns. As I have previously mentioned, we will be providing the Environmental Protection Agency with a detailed comment letter. Copies of this letter will also be forwarded to the appropriate local representatives and will also be entered into the Administrative Record.

Thank you.