



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

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

August 31, 1993

Todd Bober, Remedial Project Manager
U.S. Department of the Navy
Northern Division
10 Industrial Highway
Code 1823 - Mail Stop 82
Lester, PA 19113-2090

received
8-31-93
FAXED JA

RE: EPA Comments on draft Record of Decision (ROD) for
McAllister Point landfill, Naval Education and Training
Center, Newport, Rhode Island.

Dear Mr. Bober:

Attached you will find EPA's comments on the draft ROD, dated August 6, 1993. You should be aware that EPA will be providing additional comments on the ROD after receipt of the State of Rhode Island's letter of concurrence and after reviewing the responsiveness summary from the public comment period.

Each of the attached comments references a specific section and page of the draft ROD. In general, the submittal was a good first draft, and I am looking forward to receiving the final draft ROD on or before September 13th.

If there are any questions regarding these attached comments, then you should feel free to call me at 617/573-9614.

Sincerely,

A handwritten signature in cursive script, appearing to read "Andrew F. Miniuks".

Andrew F. Miniuks, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: Beth Tomasello, EPA
Greg Fine, RI DEM/DSR
Paul Kulpa, RI DEM/DSR
Mike Kulbersh, CDM-FPC



Specific Comments

1. Description of the Selected Remedy, Page ii:

Revise this section to include a bullet with five-year review as part of the components of the remedy.

2. Declarations, Page iv:

Revise this section to add Paul G. Keough, **Acting** Regional Administrator to the signature block and add the Region's address to this page. The address is:

U.S. Environmental Protection Agency
John F. Kennedy Federal Building
One Congress Street
Boston, MA 02203

3. Site Name, Location and Description, Page 1:

Fourth paragraph - Correct the apparent typographical error from "Administrative Record" to "Administrative Record".

4. Community Participation, Page 6:

The Navy should consider defining the terms "Administrative Record" and "Information Repositories".

5. Statutory Requirements/Response Objectives, Page 12:

In Section VII A., the Navy refers to remedial action objectives, but are listed as "response objectives." The terminology should be changed to read "remedial action objectives" to ensure that the terminology is consistent.

6. Description of Alternatives, Page 13:

Under Alternative 1, the word "or" is missing in the third line between "reduce" and "to".

7. Compliance with ARARs, Page 16:

Revise this section to read, "... with the requirements of Section 404 of the Clean Water Act **and other federal wetlands regulations.**"

8. Reduction of Toxicity, Mobility or Volume Through Treatment, Page 17:

Under the discussion of Alternative 3 in this section, the word "no" in the second line should read "not".

9. State Acceptance, Page 18:

This section should be revised to specifically refer to letters that may be in the Administrative Record, or if the State submits a formal comment letter in addition to any comments in the expected concurrence letter.

If there are any documents evidencing the changes required by the State, then this section should focus the public's attention to these documents.

10. Description of the Remedial Components, Page 19:

Five-year review should be added as the final bullet point in the description of the remedial components.

11. RCRA Subtitle C Multi-layer Cap, Page 19:

The Navy should expect to add language to the description of the cap requirements in response to the State's expected comments on the Rhode Island Subtitle D requirements.

12. Fencing and Institutional Controls, Page 22:

The Navy should consider substituting the word "implemented" for "incorporated."

13. Operation and Maintenance and Site Monitoring, Page 24:

Revise this section to add the following language to the end of that paragraph:

"The Navy will also consider any recently promulgated standards that would have been ARARs had they been promulgated at the time of remedy selection to insure that the remedy remains fully protective in light of such new standards. The Navy may also consider any newly promulgated standards at times other than these evaluation periods if appropriate."

14. Clean Air Act, Page 26:

The Clean Air Act sections need hyphens after each of the 5's. Also, there is an extra space between "Fugitive" and "Dust."

15. Federal and State Hazardous Waste Regulations, Page 27:

The discussion of the applicability of RCRA Subtitle C should reflect the discussion set forth in the Focused Feasibility Study (FFS). Therefore, the Navy should delete the sentence stating, "To date, there is no firm evidence available to indicate that RCRA-regulated materials were disposed of at the McAllister Point landfill" and instead state that historical evidence and the results of the earlier studies indicate that RCRA hazardous substances were disposed of at the landfill.

16. Federal and State Hazardous Waste Regulations, Page 27:

At the end of the ARARs discussion, include the following sentence: "It is also noted that, although the requirements, standards and regulations of the Occupational Safety and Health Act of 1970 are not ARARs, they will be complied with in connection with McAllister Point remedial activities where applicable." See 55 Fed. Reg. 8679-80, March 8, 1990.