



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

DIVISION OF AIR AND HAZARDOUS MATERIALS
291 Promenade Street
Providence, R.I. 02908-5767CERTIFIED MAIL
16 May 1990Capt. W.F. Burke, CEC, USN
Dir ctor of Public Works
NAVAL EDUCATION AND TRAINING CENTER
N wport, RI 02841-5000

Dear Capt. Burke:

Th Division of Air and Hazardous Materials (DAHM) has received a copy of the 100% bid documents for the closure of Tank Farm 5, Tanks 53 & 56, dated 5/7/90. The purpose of this letter is to comment on the documents and clarify the Divisions view as to the status of this project.

I have recently had several conversations with Rachael Marino as to our comments on the bid documents. These comments include several points which the Division feels need clarification, as follows:

1. Section C1, f. SAMPLING AND ANALYSIS, (5), page C-9, regarding analytical procedures - all parties involved should be aware that the new Toxicity Characteristic Leaching Procedure (TCLP) was promulgated by EPA March 29, 1990, and will go into effect September 25, 1990. Therefore, this paragraph should include the ability to perform TCLP when necessary to comply with 40 CFR 261 et al (Federal Register, Thursday, March 29, 1990) and land disposal restrictions.
2. Section C1, h. PRETRANSPORT REQUIREMENTS, (6) On-Site Storage, page C-11 - this should be clarified to include that storage of all hazardous wastes generated shall not be stored over 90 days and must be stored in a proper secondary containment area.
3. Section C1, j. DISPOSAL REQUIREMENTS, (2) Procedures, (a), page C-12 - The sentence regarding landfill disposal restricted (LDR) wastes should include all LDR wastes, which at the present time will include all hazardous wastes identified in 40 CFR 261 effective May 8, 1990, and any other hazardous wastes identified as LDR wastes at the time of the tank closure.

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4. Section C5, i. TANK CLEANING, -

(7), page C-36 - the leachate procedure should be clarified as TCLP.

(8), page C-36 - the term 'limits listed' should be clarified to include what list is being referred to.

(9), page C-36 - DEM must approve the "non-hazardous" determination before the Contractor can proceed with the demolition.

5. Section C6, b. DESCRIPTION OF WORK - this paragraph includes the sentence "The work also includes the removal and disposal of contaminated soil", including the removal of 3,404 cy of contaminated soil. The Department is not confident that the removal of this amount of soil will include the entire extent of contaminated soil. Prior to demolition, regrading and seeding a complete assessment of soil contamination must be conducted and all contaminated soil identified removed. This includes a DEM approved sampling plan, hazardous determination and proper disposal procedure, and resampling plan to determine complete removal of contaminated soil.

6. Section C6, f. PROTECTION, (2) Site Drainage- This section indicated that the Contractor must 'provide for the collection and disposal of surface and subsurface water encountered during construction.' Section C2, d. REMOVAL OF CONTAMINATED WATER PHASE, indicates that groundwater purged shall be treated through the treatment system and discharged. DEM requires that all surface and subsurface water collected during construction be treated through the treatment system. This must be clarified in this Section C6.

It is the Division's view that there are several areas which have not been sufficiently addressed in the present bid document. This includes the complete removal of contaminated soil, and the groundwater remediation plan. Conversations with Rachael indicate that NETC is not in the position to include these areas in the current bid document.

According to your letter of 3 October 1989 NETC will be submitting the final tank closure plan and specifications to DEM by 31 August 1990. The Department requires that this final plan include the plans, specifications and timetable for the removal of all contaminated soil and groundwater remediation of the area around Tanks 53 and 56. This should also include information pertaining to bid contracts and available funding to complete these tasks within a timeframe immediately following removal of waste from the tanks. Until which time that all of this information is received, NETC will not be considered in compliance with all of the items cited in the 29 August 1989 Letter of Deficiency, and retention of your Hazardous Waste Treatment, Storage, and Disposal Facility permit remains in jeopardy.



The Department is aware that NETC has requested to postpone groundwater remediation until the RI/FS is completed, by late 1993. The Department has not agreed to this request. It is our understanding that preliminary groundwater data will be available for all of Tank Farm 5 by year end 1990. If at that time you can present data to the Department indicating the presence of groundwater contamination from other areas of Tank Farm 5, which would interfere with groundwater remediation of Tanks 35 and 56, the Department will again review your request to postpone the groundwater remediation portion of this project. Until that time, however, the Department does not feel that there is sufficient data to warrant postponement.

The Department would also like to make clear that any recontamination of the tanks, demolition debris or backfill, due to incomplete soil or groundwater remediation, will require the reassessment and remediation of such recontamination.

If you have any questions please feel free to contact me at 277-2797.

Sincerely,

Cynthia M. Gianfrancesco

Cynthia M. Gianfrancesco, Engineer
Division of Air and Hazardous Materials

NETC3.ltr



TELECOPIER TRANSMITTAL SHEET
(UNCLASSIFIED USE ONLY)

A. FOLLOWING DOCUMENTS ARE FOR: BRIAN HELLAND
OF CODE: 141
PHONE EXT: 6280
NUMBER OF PAGES BEING SENT INCLUDING COVER SHEET _____

B. DOCUMENTS BEING SENT BY: RACHEL MARINO
CODE: 424 NETC
PHONE EXT: 3735
DATE/TIME: 1:15 @ 5/21

C. REMARKS:

BRIAN -
For your perusal - soil contamination seems to be a big issue - I think they need to understand the IR program better & see where these two projects merge.

Rachel

D. TELECOPIER: CANON FAX-520
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