



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

DIVISION OF AIR AND HAZARDOUS MATERIALS
291 Promenade Street
Providence, R.I. 02908-5767

received
4-13-93

25 March 1993

Mr. Franco LaGreca
NORTHNAVFACENGCOM
10 Industrial Highway
Tinicum Industrial Park
Mail Stop 82
Lester, PA 19113-2090

RE: Draft Report, Soil Investigation Tank Farm Five - Tanks 53 and
56 - January 1993

Dear Mr. LaGreca:

The Division of Waste Management has reviewed the above referenced report. The Division has also reviewed the comments submitted by Andrew F. Miniuks, Remedial Project Manager, US EPA Region I.

In general, the Division agrees with the EPA comments and would like to see them addressed in the final report. Of concern, however, is the EPA comment number 27 regarding the requirement of state permits and compliance with state regulations. The Department wishes to clarify that the Rhode Island Department of Environmental Management, Division of Waste Management (formerly the Division of Air and Hazardous Materials) is the lead agency on the soil remediation action due to the fact that this action is a result of a RCRA Storage Facility Permit Condition which began prior to Tank Farm 5 becoming an NPL site. As such, the Navy is required to obtain any and all permits which may be required and must remain in compliance with all state regulations through the entire soil remediation action. This may include, but not be limited to, hazardous waste treatment permits, air pollution discharge permits, groundwater and/or surface water discharge, recharge or pumping permits, etc.

The Divisions comments are as follows:

1. Section 2.2, History, Page 2-2

The report should include information regarding past releases which have occurred at Tank 53.

2. Section 4.3.2, Page 4-5, 1st paragraph

The Division agrees with the assessment that Tank Farm 5 should be considered an area of high environmental impact and

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classified as an environmentally sensitive area. Based on this classification the TPH cleanup standard of 100 ppm is acceptable. Any diversion from this standard must be submitted in writing for approval, and must include data to substantiate the change.

3. Section 4.3.2

Page 4-5, • Tank 53 - TPH Results

Please include the analytical procedure used in the TPH analysis (test procedure code and a brief description of the test procedure).

Data in the report is not consistent with its location reference for boring B-20, locating it 100 feet from Tank 53 in paragraph 1, and 50 feet from the tank in paragraph 3. Please correct the erroneous location. Also, the general range of TPH levels is 1,000 ppm to 20,000 ppm, but it should be clarified that the highest TPH level present is 31,000 ppm at B-37.

Page 4-7, Volatile Organic Compounds

Information regarding VOC levels found in all previous soil sampling events compared to the VOC levels recently found should be included in this section. This should include some basic assumptions regarding the mobility of the contaminants in the soil, based on that comparison.

4. Section 4.3.4.

Page 4-7, • Background Boring and Blank Sample Results, paragraph 3

Explain where the tap water came from and give a possible explanation as to why there were low levels of VOC's in the tap water.

Page 4-8, • Tank 53 - VOC Results

It must be clarified in this section that some of the VOC's which were found in the highest levels are hazardous wastes listed in 40 CFR 261.31. These constituents were also found in the waste which was removed from Tank 53. Since there is no record of how these constituents came to be present in the tank and subsequently in the soil, we have assumed that they were used for their solvent properties, and therefore are considered F listed hazardous wastes. Closure of Tank 53 was based on this assumption. Therefore, a hazardous waste determination must be included in this section specifying the presence of these F listed solvents and proposed clean-up standards.

5. Section 4.3.5 TCLP Results, Paragraph 2

This section should specify that, *under the TCLP criteria*, none of the samples exceeded the regulatory limits which define the soil as a hazardous waste.

6. Section 4.4.1 Tank 53 - Preliminary Extent of Soil Contamination, Page 4-11, last paragraph

Please include the equation used to come up with this calculation.

7. Section 4.4.2 Tank 56 - Preliminary Extent of Soil Contamination, Page 4-12, last paragraph

The Division concurs with this determination.

8. 5.1 Introduction, Page 5-1, paragraph 1

The last sentence needs to be revised to indicate that the soil does not meet the regulatory criteria under TCLP; however, it does meet the regulatory criteria under 40 CFR 261.31.

Also, it should be explained that the area to be remediated is an estimate and may be expanded or reduced, dependant upon actual conditions encountered at the time of remediation.

9. General

The report fails to mention the existance of the signed Record of Decision (ROD) for Interim Remedial Action for Ground Water Operable Unit, Tank Farm 5, Tanks 53 and 56, signed 29 September 1992. The effect of all proposed alternatives on the Interim Remedial Action and on ground water must be considered and fully explored.

Also, it appears that additional site specific information is needed to further determine the feasibility of the In-Situ Vapor Extraction and Bioremediation alternatives. The information necessary, such as soil chemistry, permeability, geology and microbiological factors, is similar for both alternatives and should have been explored as part of this proposal. Soil samples and boring information should supply a minimal amount of information to allow further investigation of these alternatives, which should be included in the final report.

10. Section 5.2.1 No Action Alternative

This alternative is not acceptable.

11. Section 5.2.2 Excavation and Off-Site Landfilling Alternatives

The information presented does not substantiate the assumption that the TPH levels at B-20 are a result of groundwater contamination, based on the fact that TPH levels were not the highest at the deepest sampling point. Additional proof is required in order to accept this assumption, otherwise, the remediation of soil around B-20 must be included in this alternative.

Expound upon the federal Land Ban restrictions for the F-listed wastes found in the soil.

Implementability, page 5-4, third bullet

TPH levels exceed 20,000 ppm in some areas (B-27 has levels as high as 31,000 ppm). How do you intent to address the 20,000 ppm limit if this alternative is chosen, when you have levels elsewhere higher than 20,000 ppm? Also, can these facilities accept low levels of F-listed hazardous wastes?

12. 5.2.3, Asphalt Batch Alternative, Implementability, page 5-6

While the state solid waste regulations allow asphalt batch facilities for virgin spill residues only, that should not eliminate the possibility of obtaining an on-site hazardous waste treatment permit for asphalt batching of waste oil spill residue. This option should be looked into further by TRC. Also, locations of off-site asphalt batch facilities which are permitted to accept waste oil spill residues such as those present at Tank Farm 5 must be located and identified in this report.

Also, the remediation of soil around B-20 must be included in this alternative.

13. 5.2.4 In-Situ Vapor Extraction Alternative - Implementability

To reiterate the second paragraph of this letter, any permits required must be obtained and could include hazardous waste treatment permits, air pollution control permits, etc.

The report should also supply information on the effectiveness of this alternative on the VOC's present, semi-volatiles, and the type of oils found at Tank 53. This should include whether this type of treatment can be successful with the amounts of TPH present at Tank 53. In addition, the permitting issues associated with the off-gas system can easily be rectified with the addition of vapor phase activated carbon units, or catalytic oxidation to capture the VOC's from the air discharge.

14. 5.2.5 In-Situ Bioremediation Alternative, Page 5-9, first paragraph

Since this option often combines ground water treatment, an indepth proposal combining this alternative with the current ROD for Interim Remedial Action should be included in this section. The report should also supply information on the effectiveness of this alternative on the VOC's present, semi-volatiles, and the type of oils found at Tank 53. This should include whether this type of treatment can be successful with the amounts of TPH present at Tank 53.

Effectiveness - Include more information regarding the effectiveness in treating chlorinated hydrocarbons.

Implementability - Include information regarding groundwater permits are required for injection and extraction well installation and operation.

15. 5.3 Summary of Soil Alternatives, page 5-10

Include further exploration of and proposal for the alternative of a combination of the alternatives presented. This must also include informatin on the effects of the ROD for Interim Remedial Action on and in conjunction with the proposed alternatives, and the effectiveness of each alternative on the types and amounts of contaminants present.

Page 5-11, second paragraph

As per comment #12, control of the air discharge can be accomplished by adding vapor phase activated carbon units or catalytic oxidation. Include proposal of this option.

As per comment #11, the off-site asphalt batch facility locations must be investigated and included in the alternatives.

16. 5.4 Effect of Soil Remediation Alternatives on Product Remediation

This section should include a review of the proposed Record of Decision for Interim Remedial Action for Ground Water Operable Unit, Tank Farm 5, Tanks 53 and 56, signed September 29, 1992, and include its effect alone and in combination with the other alternatives.

17. Table 6, all pages

The total VOC's must indicate the units in ppm or ppb.

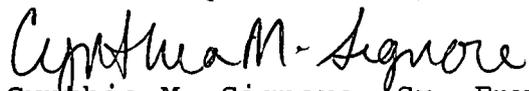
The Division would like to see a recommendation for a specific proposed alternative, at which point it will make a determination as to if it agrees or disagrees with the proposal.

In accordance with the approved May 1992 closure plan, this portion of the closure was to have been completed in October 1992. The Navy must adhere to the approved schedule or submit a request for extension of closure. If this loss of time cannot be made up within the next 6 months, a request for extension must be submitted within 30 days. A revised schedule must also be submitted within 30 days.

Comments from the Division of Site Remediation should be forthcoming shortly. Please wait for their comments prior to issuing the final report.

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

Sincerely,



Cynthia M. Signore, Sr. Environmental Scientist
Division of Waste Management

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cc: Greg Fine, RIDEM
Andrew Miniuks, USEPA