



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

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

December 23, 1992

Deborah Stockdale, RPM  
U.S. Department of the Navy  
Northern Division  
10 Industrial Highway  
Code 1823, Mail Stop 82  
Lester, PA 19113-2090

RE: Removal Action Memorandum for Lead Contaminated Soils  
at Building 31.

Dear Ms Stockdale:

Enclosed you will find a sample action memorandum (Study Area 50 - World War II Aircraft Fuel System, Final, November 1992) for a "time-critical" removal action and a copy of the "Superfund Removal Procedures - Action Memorandum Guidance", December 1990. I am sending these documents to you as a result of the phone conversation between Mary Sanderson and Al Haring on Tuesday, December 15th.

As a general comment, the US Navy should ensure compliance with the requirements of the National Contingency Plan (NCP) regarding removal actions. According to Section 300.415 of the NCP "Removal action.", if removal actions are not initiated within six (6) months, then the lead agency shall be required to conduct an engineering evaluation/cost analysis (EE/CA) or its equivalent. Therefore, if the US Navy is intending to address the lead-contaminated soil beneath Building 31 as a "time-critical" removal action, then the work on this project must begin within six months of determining that the removal action is appropriate.

In order to determine the proper management procedures for the soils beneath Building 31, the US Navy should conduct a hazardous waste determination as defined in 40 C.F.R. Part 261, or within the authorized State regulations. If it is determined that the soils are to be managed as hazardous wastes, then the US Navy must ensure compliance with the requirements of the Resource Conservation and Recovery Act (RCRA) regarding the transportation, treatment, storage and/or disposal of hazardous wastes.

The US EPA is recommending that the removal action taken by the US Navy achieve a cleanup level for lead in the soil of 500 ppm. By achieving a cleanup level of 500 ppm of lead in the soil, the US Navy would reduce the potential for additional remedial action(s) in this area.



We look forward to the opportunity to review a draft Action Memorandum prior to the US Navy initiating the action(s).

If you have any questions regarding this transmittal letter or the enclosures, please feel free to call me at (617)573-9614.

Sincerely,



Andrew F. Miniuks, Geologist  
Federal Facilities Superfund Section

Enclosures

cc. w/o enclosures

Mary Sanderson, EPA  
Carol Keating, EPA  
Paul Jameson, CTDEP