

16953.1-006

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NWS EARLE

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Turner, Russell

From: Goepfert, Greg [ggoepfer@earle.navy.mil]
Sent: Tuesday, December 15, 1998 7:43 AM
To: 'jpkolicius@efdnorth.navfac.navy.mil'; 'turnerr@ttnus.com'
Cc: Sciascia, Deborah; Herc, George; Hermanni, Gus
Subject: FW: Comments on ROD ou-4

JOHN:

PLEASE MAKE SURE THAT MS. SCIASCIA'S COMMENTS ARE INCLUDED IN THE FINAL RECORD OF DECISION FOR THE EIGHT NO FURTHER ACTION SITES. THANKS.

GREG GOEPFERT.

-----Original Message-----

From: Sciascia, Deborah
Sent: Tuesday, December 15, 1998 8:16 AM
To: Herc, George; Goepfert, Greg
Cc: Hermanni, Gus; Bova, Kevin
Subject: Comments on ROD ou-4

Greg,

I hope that these changes don't ruffle the regulators feathers. My rational is this, in all likelihood restrictive covenants will be placed in the documents transferring any of the property. However, we, the Navy, presently do not have either the authority to transfer property or to create the restrictive covenants.

There are basically two methods of transferring property, one is through BRAC, but that would require an act of Congress, then we could take action in accordance with the legislation. The second method is by declaring certain parcels excess, wherein GSA handles the transfer and the required documents, we could recommend restrictive covenants, but GSA would actually take action. In any event CERCLA 120 (h) requirements will apply unless Congress changes the law, which is not likely.

Two suggested changes:

p. III-7, mid page, delete paragraph that begins ..."In the event of full or partial base closure...."

Change to read:

In the event of full or partial transfer of property, through existing legislation or through future base closure authorization, a review would be conducted to determine the suitability of any parcel for transfer of ownership. Whether or not additional remediation is required, and whether formal restrictive covenants should be included in the transfer document, would be reviewed at that time. Property transfers must comply with applicable Federal statutes, including CERCLA.

p. III-8, Delete last sentence of the response to comment #8:

Insert:

In the event of full or partial transfer of property, through existing legislation or through future base closure authorization, a review would be conducted to determine the suitability of any parcel for transfer of ownership. Whether or not additional remediation is required, and whether formal restrictive covenants should be included in the transfer document, would be reviewed at that time. Property transfers must comply with applicable Federal statutes, including CERCLA.

COMMENT SHEET

PROJECT TITLE: Record of Decision, Operable Unit 4, DRAFT
Issued by Tetra Tech-NUS, Inc. on 7 December 1998

COMMENTS WRITTEN BY: Gregory J. Goepfert DATE: 7 December 1998

REFERENCE

PAGE, PARA., DWG. #

COMMENT

RECOMMENDATION, IF ANY

Pg. II-26, Para. "SP",
Last sentence.

Last sentence should read as follows:
Four of the six wells were formally
Closed on 26 Jul 1995. Two of the six
Wells were capped for future use NOT
**THE SIX WELLS INSTALLED IN 1993
WERE DESTROYED BY SUBSEQUENT
CONSTRUCTION ACTIVITIES AT THE SITE.**

Revise, as specified.

Pg. II-26, Para. "Storage Bldg.
Construction"

Please replace last sentence as follows: The excavated
soil was stockpiled and composite soil samples
Were collected and analyzed to determine disposal
Options and were found to be "non-hazardous."
Subsequently, these soils, along with quantities (6000 yd3)
Of non-hazardous soils previously stockpiled, were
Placed under the landill cap at Installation Restoration
Site # 5, which aided the proper grading of the
Capped site.

Please revise.

Pg. II-37, "Summary of Risks"

Change "nor" to "no."

Please revise.

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COMMENT

RECOMMENDATION, IF ANY

Pg. II-41,
"Summary of Risks"

Spelling "excess", or
perhaps a rewrite using
different wording may be
in order.

Your call.

General

Suggest "Summary of Risk" sections
Be tailored for reading by someone who is
Not of a technical background; i.e., try to
Refrain from quoting "HI"s, "regulatory
Criteria, etc."

Keep in mind for next major submission.