



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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June 9, 2003

received
06-13-03

Franco LaGreca
U.S. Department of the Navy
Naval Facilities Engineering Command
Northern Division
10 Industrial Highway
Code 1823, Mail Stop 82
Lester, PA 19113-2090

Re: Public Involvement for the Soil Removal Actions at the Old Fire Fighting Training Area

Dear Mr. LaGreca:

As you know, there are several sites at the NETC that are undergoing Superfund investigation, including the Old Fire Fighting Training Area ("OFFTA"), commonly referred to as Katy Field. In March 2002, the Navy issued a draft final Feasibility Study ("FS") for the OFFTA that evaluated a range of remedial alternatives for soil, groundwater, and sediment. EPA, the Navy and RIDEM reached agreement on the proposed remedies for soil (removal and disposal) and groundwater (institutional controls and monitoring). EPA and RIDEM agreed that the sediments should be dredged because of contamination and demonstrated risks; the Navy preferred to monitor the sediments. In the process of informal dispute resolution, the Navy decided to proceed with a removal action for the soils instead of following the remedial process.

As you know, different requirements for public participation apply to removal actions and remedial actions. The FS estimates that the removal and disposal of soil will take approximately 4 to 6 months. The Navy's draft *Fact Sheet for the Soil Cleanup at the Old Fire Fighting Training Area* dated June 2003, estimates two years. Regardless of which estimate is correct, the requirements regarding community relations set forth at 40 C.F.R. §300.415(n)(3) apply. Had there been agreement on the proposed remedy for the sediment component, the next step would have been to propose a remedy for the cleanup to the public in a Proposed Plan. The opportunity for a public meeting is required by 40 C.F.R. §300.430(f)(2).

The Navy's draft *Fact Sheet for the Soil Cleanup at the Old Fire Fighting Training Area* dated June 2003, correctly states that the proposed soil excavation will "address the highest risk by removing contaminated soil from the environment and disposing it properly, thereby ensuring long-term protection of human health and the environment." Hosting a public meeting would provide the opportunity to explain the differences between the various risk assessments performed at the site and the rationale for taking a CERCLA action. Citizens may not clearly understand why a multi-million dollar action is being taken at a site that they were told was clean several years ago. Moreover, hosting such a meeting would inhibit perceptions about secrecy and would demonstrate transparency in the Navy's decision making processes about the site.

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EPA believes that the citizens involved in the exposure interviews, attendees at the public meetings, little league participants, and members of the military youth activity center should be invited to the informational meeting. Since access to the base, including the Officer's club, may be limited during increased security periods, EPA strongly recommends that the meeting be held off of the base property. Given the history of public concern about this site, it is essential that the Navy give the public a reasonable opportunity to ask questions and submit written and oral comments.

I look forward to working with you and the Rhode Island Department of Environmental Management toward the cleanup of the OFFTA. Please do not hesitate to contact me at (617) 918-1385 should you have any questions or wish to arrange a meeting.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kimberlee Keckler', written over a horizontal line.

Kimberlee Keckler, Acting Chief
Federal Facilities Superfund Section

cc: Paul Kulpa, RIDEM, Providence, RI
Captain Ruth Cooper, NETC, Newport, RI
Cornelia Mueller, NETC, Newport, RI
Kathy Marley, NETC, Newport, RI
Mary Sanderson, USEPA, Boston, MA
David Peterson, USEPA, Boston, MA
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