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STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

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

31 March 1992
Certified Mail

A.T. Pringle
CAPT., CED, U.S. Navy
Director of Public Works
NAVAL EDUCATION AND TRAINING CENTER
Newport, RI 02841-5000

RE: Draft Closure Plans for Hazardous Waste Storage Facility,
Buildings 1166 and A105, and Tanks 53 and 56, Tank Farm 5 at
the Naval Education and Training Center (NETC), Newport, RI

Dear Captain Pringle:

The Rhode Island Department of Environmental Management (RIDEM) has received the draft closure plans which were submitted by NETC. The draft closure plans have been reviewed, and must be revised and re-submitted for approval, incorporating the following requirements and comments:

General Comments

1. Each section of the closure plans should include specific references to the requirements as set forth in 40 CFR 264 Subpart G. This will aid in expediting review of the plans by RIDEM. Failure to include these references will hold up the review process by one additional week.
2. Please be aware, NETC is not required to submit closure plans to USEPA for approval. This additional review will delay closure.
3. Please specify in each plan that the Material Safety Data Sheets for all chemicals used in the closure activities will be included in the closure plan, and plans and specifications for closure.
4. Please be aware that post-closure activities are required as part of the closures for Buildings 1166 and A105, and Tanks 53 and 56. Post-closure plans must be written and a final, approved copy submitted by 30 September 1992.
5. Closure and post-closure cost estimates and financial assurance for closure and post-closure should be addressed in both closure plans as specified under Section XXV. Funding, in the FFA.

Telecommunication Device for the Deaf 277-6800
Fax Number 277-2017

Draft RCRA Closure Plan, Buildings 1166 and A105

Section Comment

1.2.1 In accordance with correspondence between RIDEM and NETC on 17 February 1988, NETC was not authorized to store hazardous waste on the asphalt pavement in the fenced area adjacent to Building 1166 under its TSDF permit. To do this NETC would have had to request major permit modifications, which was never done. Please revise this section to reflect the fact that the asphalt pavement was not a permitted hazardous waste storage area, even-though it was used for such purposes; however, this area must still be included in the closure plan and activities.

Include the storage capacity for Building 1166. As previously addressed, the storage aisles along the outside walls do not provide adequate space to conduct inspections and emergency actions. The storage capacity must be re-calculated, minus capacity of the outside wall aisles. Include the calculation used to determine the revised capacity.

2.1.1 Revise this section to reflect the fact that the asphalt pavement was not a permitted hazardous waste storage area, even-though it was used for such purposes.

Table 2-1 Provide more information regarding waste identified as NR (non-regulated), including the criteria used to characterize the waste as NR. Specifically, several of the wastes which NETC characterized as NR wastes, such as cleaning compounds, fuel, and solvents, often meet characteristics of hazardous waste. Non-hazardous characterizations must be documented.

3.2 Include the specific reference to compliance with the TSCA PCB clean-up regulations, 40 CFR 761 subpart G.

4.1 It was the RIDEM's understanding, from past conversations with NETC personnel, that groundwater monitoring wells would be installed around Buildings 1166 and A105 as part of closure activities. The decision to not conduct groundwater monitoring must be justified.

The closure plan must specify that a contract for Plans and Specifications will include site specific work to be conducted, including justifications for the locations of all surficial and subsurficial samples to be taken.

NETC should be aware that conversations between RIDEM and USEPA indicate there is a strong possibility that if groundwater monitoring wells are not installed as part of

the facility closure activities, it will be ordered under a RCRA Corrective Action or will be added to the recently signed Federal Facilities Act under CERCLA 120 (FFA) as a Solid Waste Management Unit (SWMU) which requires study. These determinations have been made as a result of past history at the site. Specifically, there is evidence of hazardous waste spills in the containment trenches of both buildings, no evidence that the trenches have not leaked, there have been repeated incidences of non-reported spills of hazardous waste throughout the facility, and the storage areas have, at times, stored numbers of drums over the approved capacity for the buildings. Installment of groundwater monitoring wells down-gradient of Buildings 1166 and A105 would verify the presence or absence of contamination, and if no contamination is found, would prove that the sites have been clean-closed, and prevent any further action under RCRA Corrective Action or the FFA.

- 4.2 Specify the closure performance standard and wipe sample standard as per 40 CFR 761.125
- 5.0 The paragraph addressing post-closure requirements should be removed from this section and placed in a section addressing this specific requirement. The plan must specify that a request to eliminate post-closure monitoring will be submitted to RIDEM if soil and groundwater contamination is not found. In the event that soil and groundwater contamination is found, a post-closure monitoring plan must be written, approved by RIDEM by 30 September 1992, and ready to institute upon complete closure of each hazardous waste management unit.

Please be aware that the proposed RCRA Corrective Action Standards are not yet approved closure standards, and proposals to use these standards must be backed up with documentation and demonstrations as to why these closure standards should be acceptable.

Building 1166 Shed - The closure performance standards for Building 1166 Shed should be revised to take the most conservative approach to determining the clean-up levels. The actual proposed standards for each constituent, including the applicable sections of the proposed RCRA Corrective Action Rule, must be included in the closure plan, and NETC must demonstrate how the clean-up standards were derived. These clean-up standards must include standards for all constituents stored in the facility during the life of the facility.

Building 1166 Asphalt - The closure performance standards for Building 1166 Asphalt must be more fully defined in the revised closure plan. The baseline referenced in the draft plan can be used for those organic compounds normally found in asphalt, and determined from an asphalt located in an area that, in addition to those criteria stated in the draft plan, does not receive automotive traffic, and has received approximately the same amount and type of use as that at Building 1166. Closure standards must be presented for all other constituents, preferably in the same manner and with the same demonstration as all other closure performance standards.

Building 1166 Soils - NETC must propose the most conservative standards available, which would be the RCRA Corrective Action Rule, Appendix A. Again, the closure performance standards must be presented in more detail, with actual proposed standards for all constituents stored in the storage facility during the life of the facility, and demonstrations as to how the clean-up standards were derived.

Building A105 - This section must include the specific citation from 40 CFR 761.125 for determining the clean-up standard. The wipe sampling methodology can either be presented here, or refer to the forthcoming plans/ specs.

- 6.0 Specify that all hazardous waste in storage in Buildings 1166 and A105 must be removed prior to the commencement of initial sampling activities, and may not re-commence until closure certificates are submitted and approved by RIDEM. All waste generated during closure activities must be properly stored at a location other than Buildings 1166 and A105, and must meet all storage requirements.
- 7.1 Specify that cracks, joints and holes in the floors of the storage buildings will not be filled and/or sealed until it has been verified that no contamination is present.
- 10.0 Closure Certifications are not required to be submitted to US EPA for approval.

The closure requirements pertaining to post-closure, as stated in 40 CFR 264.116-120, must be included in the facility closure and addressed in this closure plan.

Closure Plan, Tanks 53 and 56, Tank Farm 5

The tank closure plan fails to include the requirement for sampling under the floors of each tank. As referenced in the 7 January 1992 letter from RIDEM to NETC, and 4 February 1992 meeting, the RIDEM and USEPA is requiring an investigation under the tank floors to verify that no contamination exists. If NETC can demonstrate that Tanks 53 and 56 were constructed to prevent any possibility of contamination under the tanks, RIDEM will re-consider this requirement.

In addition, NETC has not addressed the issue of the fuel lines which feed all of the tanks in Tank Farm 5. NETC has not submitted documentation indicating that these fuel lines have been drained and cleaned, or that they will be drained and cleaned. The fuel lines could be an additional source of contamination, and must be drained and cleaned prior to initiating the contract for the Investigation of Soil Contamination Resulting from Tanks 53 and 56.

1.2 Tank Cleaning - include the reference to the actual tank cleaning contract, and contract/project number, for details.

Hydrogeologic Investigation - include the reference to the actual Tank Closure Investigation, and contract/project number, for details.

4.0 Each area under this section must be more detailed, as required in 40 CFR 264 Subpart G. All existing and previous contracts must be referenced. Include the requirement for all sample results from soil and groundwater sampling to be submitted to RIDEM in a timely manner.

Re-sampling of Monitoring Wells - As stated in the RIDEM letter of 7 January 1992 to Franco LaGreca, in accordance with Item 4, groundwater monitoring must begin immediately and continue on a monthly basis. Monitoring well sampling, and an extended sampling plan, must be addressed in the closure plan. As discussed in our meeting on 4 February 1992, NETC was to attempt to begin groundwater monitoring well sampling as soon as possible. Please notify RIDEM as to your progress.

Interim Groundwater Remedial Action - Specify that this action, as well as all other groundwater remediation, is being completed under CERCLA, and explain how this determination was reached.

Soil Investigation - Due to the fact that the site is in close proximity to Narragansett Bay, RIDEM feels it should be classified as a sensitive area, in which case an acceptable clean-up level for TPH is 100 ppm. The clean-up level for TPH of 300 ppm is acceptable for non-sensitive area. NETC must demonstrate to RIDEM why this area should not be considered a sensitive area, or change the cleanup level to 100 ppm TPH.

Soil Remediation - Submit more detail or refer to an existing contract for more details.

Tank Demolition - Postponement of the tank demolition portion of the closure until groundwater remediation is nearly complete is unacceptable. As previously discussed, demolition of the tanks is a part of the RCRA closure, and must be completed within an acceptable time frame. The time schedule for this action is more fully discussed in the comments for section 5.0. Also, this section of the closure plan needs more detail or refer to the existing tank demolition contract.

5.0 Schedule for Closure

The schedule submitted with the draft closure plan is unacceptable. The time to complete soil investigation and remediation must be shortened. The Soil Investigation Final Report and a final schedule must be completed and submitted to RIDEM no later than 30 September 1992. RIDEM believes this can be accomplished by revising the schedule as follows:

1. Review of draft reports and plans/specs need not be conducted by EPA for non-groundwater remediation actions. RIDEM can assure a 2 week turn-around for all reviews.
2. NETC must require a shorter time period for the submittal of written reports from contractors, the preparation time for contracting and plans and specs., and review/comment periods.
3. The writing of the contract for soil remediation must begin when the draft investigation report is available, no later than mid August 1992.
4. The construction portion of the soil remediation contract must be ready to begin within the second quarter of calendar year 1993.
5. It is the Departments understand that if NETC and USEPA act efficiently, groundwater remediation can begin as soon as the ROD is signed, in September 1992.
6. The tank demolition schedule is too lengthy. Revision of the plans and spec should begin immediately (RIDEM comments on the current plans and specs have been submitted), the review time and time for final specs should be shortened by several weeks each, and the closure certificate for all non-groundwater activities should be available by the end of demolition.

7. Actual tank demolition must begin in conjunction with or shortly thereafter soil remediation construction begins, no later than the second quarter of calendar year 1993, and should be completed by the end of the third quarter of 1993. At this point groundwater remediation should be underway, and the problem of re-contamination eliminated.

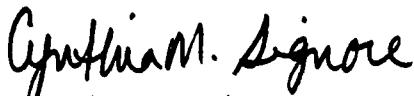
References must be made as to why closure was not complete within the required 180 day period, if extensions were requested and what demonstrations were presented, if extensions were granted and until what date.

- 6.0 Post-Closure Plans - Post closure plans must be submitted, as contamination is currently present in the ground and groundwater. The post-closure plans must be written in accordance with 40 CFR 264.117-120, and the final plan must be submitted and approved by RIDEM by 30 September 1992.
- 7.0 Notice to Deed and Notice to Local Land Authority - In accordance with 40 CFR 264.116, a notice to the Deed must be filed, and local land authorities notified, that contamination exists(ed), that remediation was carried out, and, if contamination still exists at the time of closure, the types, amounts, and locations of all contamination present.

The revised closure plans must be re-submitted, with all of the above changes, within 30 days of receipt of this letter. Failure to meet this deadline will result in unnecessary delay, and jeopardize the signing of a Consent Agreement between parties.

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

Sincerely,



Cynthia M. Signore, Sr. Environmental Scientist
Division of Air and Hazardous Materials

cc: Franco LaGreca, NORTHNAVFAENCOM
Frank Battaglia, EPA Region I
Carol Keating, EPA Region I
Paul Kulpa, RIDEM
Claude Cote, RIDEM

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