



DEPARTMENT OF THE NAVY
NAVAL EDUCATION AND TRAINING CENTER
NEWPORT, RHODE ISLAND 02841-5000

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NAVSTA NEWPORT RI
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IN REPLY REFER TO:

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Ser 924/40E

07 MAY 1992

State of Rhode Island
Department of Environmental Management
Division of Air and Hazardous Materials
Attn: Ms. Cynthia Signore
291 Promenade Street
Providence, Rhode Island 02908

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, Newport, RI

Dear Ms. Signore:

We are in receipt of your letter of 31 March 1992 which provided your review comments regarding the closure plans for our hazardous waste storage facilities, Buildings 1166 and A105, and Tanks 53 and 56, Tank Farm 5. We will be incorporating many of your comments into the closure plans. Revised closure plans are enclosed for review and approval. Appendices A, B, and C of the RCRA Closure Plan for Buildings 1166 and A105 are unchanged from the draft submittal of March 11, 1992 and have not been provided in the revised May 5, 1992 Plan. Our response to your review comments is provided as an enclosure.

We do not want to delay contracting actions for closure of Buildings 1166 and A105 and are proceeding with the development of plans and specifications in absence of your final approval of the Closure Plan. We expect that we can provide a copy of the draft plans and specifications to you within 30 days.

If you have any questions or need additional information, our point of contact is Stacey Snow at (401) 841 - 3735.

Sincerely,

A.T. PRINGLE
CAPT, CEC, U. S. NAVY
Director for Public Works
By direction of the Commander

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Enclosures:

- (1) NETC response to RIDEM comments**
- (2) Revised RCRA Closure Plan for Buildings 1166 and A105**
- (3) Revised Closure Plan for Tanks 53 and 56 at Tank Farm Five**

Copy to:

- NORTHNAVFACENGCOM (Code 18, Attn: Paul Burgio) (w/o enclosure (3))**
- NORTHNAVFACENGCOM (Code 18, Attn: Brian Helland) (w/o enclosure (3))**
- EPA Region I (Ms. Carol Keating) (w/ enclosures)**
- CNET N-44 (w/o enclosures)**

General Comments

1. RIDEM request that each section of the closure plan include specific references to 40 CFR 264 Subpart G. We feel that this unnecessary and should not delay the review time since the closure requirements that pertain to these two buildings are contained within 7 pages of 40 CFR 264 and you have already reviewed the plan.
2. RIDEM comment "...NETC is not required to submit closure plans to USEPA for approval." We feel it is necessary to keep EPA advised of our progress related to closure of these facilities. Copies of all correspondence and documents will be forwarded to EPA for informational purposes and/or review, as appropriate.
3. Material Safety Data Sheets are included as attachment B to Appendix A - Health and Safety Plan.
4. Per 40 CFR 264.116 through 264.120, post closure is not required for storage facilities.
5. Per 40 CFR 265.140 (c), the Federal government is exempt from this requirement.

Draft RCRA Closure Plan, Buildings 1166 and A105

Section 1.2.1 - The plan has been revised to show that the asphalt area outside of Building 1166 is not part of the permitted storage area.

The storage capacity for Building 1166 is defined in the Part B Permit as 48, 55-gallon drums. This information is provided in the revised Plan.

Section 2.1.1 - The Plan has been revised to reflect that the asphalt area outside of Building 1166 was not part of the permitted storage area.

Table 2.1 - The table has been revised. The non-regulated materials were reviewed and checked against manifests and waste profile sheets. Many were found to have been hazardous wastes. The non-regulated designations were due to data entry errors in the inventory and tracking database.

Section 3.2 - Reference to 40 CFR 761 Subpart G, 761.125 has been included.

Section 4.1 - The requirement to install groundwater monitoring wells was waived in the Permit. The need for and the placement of groundwater monitoring wells will be determined based on the results of the initial sampling as indicated in Section 4.1. Any misunderstanding appears to be due to the requirement for groundwater monitoring wells to

Encl (1)

be installed as part of the permit renewal application. When the permit renewal was denied, no further action on the installation of groundwater monitoring wells was taken.

Section 4.2 - Reference to 40 CFR 761 Subpart G, 761.125 has been included.

Section 5.0 - As noted in the general comments section, post closure is not required for storage facilities (40 CFR 264.116 through 264.120).

Closure performance standards for Building 1166 have been revised. We propose to determine the potential and/or extent of contamination based on the results of initial site sampling as detailed in Section 3.0 and if applicable, a human health evaluation will be conducted at Buildings 1166 and A105. Please advise us whether or not this is acceptable. If not, we request that you provide us a copy of a RIDEM-approved closure performance standards for a similar site.

Section 6.0 - Comments regarding hazardous waste removal and storage have been incorporated into this section.

Section 7.1 - Comments pertaining to sealing of cracks, joints and holes have been incorporated into this section.

Section 10.0 - See previous comment.

Tanks 53 and 56

Requirement for sampling under the floors of Tanks 53 and 56. Our Northern Division Engineering Field Division responded to this requirement by their letter dated March 31, 1992.

Fuel lines in Tank Farm 5. The fuel lines were sealed off in 1974 prior to hazardous waste being transferred and stored in these tanks. Waste oil was transferred to tanks 53 and 56 via tanker truck. These lines are not relevant to the closure of these tanks and therefore will not be addressed as part of this closure plan. At this time, there is no evidence that there have been releases of oil from the fuel lines in Tank Farm 5. We expect to address the fuel lines as part of the Navy's Installation Restoration Program under CERCLA .

Section 1.2 - Comments regarding the tank cleaning contract and Tank Closure Investigation have been included.

Section 4.0 - We have initiated a first-round of sampling of all monitoring wells in Tank Farm 5. Sampling commenced on May 6, 1992. Results of the sampling will be forwarded to you.

Soil Remediation. Additional detail regarding soil remediation cannot be provided until the extent of contamination has been better delineated and a remedial alternative selected. A contract number has not been assigned for this task and cannot be until remedial design is initiated.

Tank Demolition. The closure plan states that demolition will be initiated upon RIDEM direction. However, we feel strongly that demolition should not occur until groundwater remediation is nearly complete, for the following reasons:

- (a) If demolition begins during groundwater remediation, it is likely that this would seriously effect groundwater flow in the tank farm. Altering the groundwater flow will likely adversely effect the effectiveness of the remediation system (expected to be a pump and treat system). The result would be a delay in achieving cleanup of the aquifer.
- (b) As stated before, demolition while the groundwater is still contaminated would result in contamination of the insides of the tank and the backfill material. Although RIDEM and USEPA have stated that they would not require remediation of the backfill, it is difficult to justify cleaning up the area around the tanks while ignoring contamination on the backfill of the tanks.
- (c) Demolition of the tank in 1993 vs. 1994 would not provide additional protection of the environment. On the contrary, the environment would be better protected by delaying demolition. The Navy fully intends to carry out demolition, but we feel that delaying demolition is more prudent.

Section 5.0 - We agree with many of your comments. The Northern Division Engineering Field Division has prepared a revised schedule. The tank demolition contract will be revised to address your comments.

Section 6.0 - 40 CFR 264.197(b) states that a tank site will be treated as a landfill (and therefore subject to post-closure requirements) only "...if an owner or operator demonstrates that not all contaminated soils can be practicably removed or decontaminated..." Until the soil investigation determines the extent of contamination and the feasibility of removal or decontamination of the contaminated soil, the need for a Post-Closure Plan cannot be determined.

Section 7.0 - This section will be amended, as appropriate.