

RECEIVED
6-30-92

6/30/92



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

DIVISION OF AIR AND HAZARDOUS MATERIALS

291 Promenade Street
Providence, R.I. 02908-5767

12 June 1992

A.T. Pringle
CAPT, CEC, U.S. NAVY
NAVAL EDUCATION AND TRAINING CENTER
Newport, RI 02841-5000

RE: Draft Closure Plans for Hazardous Waste Storage Facility,
Buildings 1166 and A105, revised 5 May 1992, and Tanks 53 and
56, Tank Farm 5 revised May 1992

Dear Captain Pringle:

The Rhode Island Department of Environmental Management (RIDEM) has received the above referenced revised draft closure plans submitted on 7 May 1992. Upon review, the RIDEM finds the closure plans acceptable, and hereby approved, with the following comments:

Building 1166 and A105

Section 1.2.1 - The RIDEM letter dated 17 March 1992 specifically states that NETC was granted a closure extension, and approval to continue using Buildings 1166 and A105 with stipulations. One of these stipulations is that NETC re-calculate the storage capacity for Building 1166 based on the requirement for sufficient aisle space. The revised storage capacity must be stated in NETC's revised closure plan. Please include this in the final closure plan or an addendum to the current draft plan.

Section 5.0 - Proposed closure performance standards are reviewed on a case-by-case basis. As in the case of NETC, the closure performance standards included in NETC's Hazardous Waste Facility Permit required decontamination until no contamination is detected, or the contaminated area will be removed and disposed of as a hazardous waste (Section IV, page 21). This would include testing for all contaminants which may be present. NETC may choose to propose alternate closure performance standards, which RIDEM will consider. Any proposals should be submitted as soon as possible. In the event that acceptable closure performance standards are not proposed and approved, the original permit closure performance standards will be adhered to.

As per the RIDEM letter of 17 March 1992 to NETC, the RIDEM requested that a revised closure schedule be submitted within 30 days, reflecting the closure date of 30 September 1992. This revised schedule has not been received by RIDEM as of this date.

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

2868

Also, it is RIDEM's understanding that Paul Burgio, NORTHNAVFACENCOM, will be the contact person for the negotiations and signing of the consent agreements. Please verify this to RIDEM in writing, so that said negotiations can begin.

Tanks 53 and 56, Tank Farm 5

Requirements for sampling under the tanks - RIDEM and USEPA have reviewed the 31 March 1992 letter from Northern Division, and concur that sampling under the tanks is not necessary at this time. A letter from USEPA should be forthcoming to verify this.

Fuel line in Tank Farm 5 - RIDEM realized that the fuel lines in Tank Farm 5 were not a part of NETC's hazardous waste storage facility permit. However, these fuel lines do potentially impact the closure performance standards of Tanks 53 and 56, as required under 40 CFR 264.111. RIDEM is concerned that if the issue of the fuel in the fuel lines is not addressed prior to closure of the tanks, leakage from the fuel lines could result in a violation of the closure performance standards. RIDEM believes it would be in NETC's best interest to protect the human health and the environment by addressing this issue in conjunction with the closure of Tanks 53 and 56.

Section 4.0 - Initial information from the first-round of sampling conducted on 6 May 1992 indicated that several groundwater monitoring wells exhibited floating product around Tank 53. RIDEM feels that sampling of these wells should be conducted more frequently than is currently planned, and that any possibility of beginning groundwater remediation at an earlier date be actively pursued. Initial sample results were expected within 2-3 weeks, however, no sample results have been received by RIDEM to date. Additionally, several wells down-gradient of Tanks 53 and 56 were found to be dry, raising concern as to if these wells were set in the actual groundwater aquifer, or a perched watertable. These issues should be addressed.

Post-closure requirements, and closure and post-closure cost estimates and financial assurance for Buildings 1166 and A105, and Tanks 53 and 56, as addressed in the 31 March 1992 letter from RIDEM to NETC, still have not been addressed to RIDEM's satisfaction. RIDEM will continue to require NETC to address these issues as specified in the 31 March 1992 letter, either through requirements under RCRA and the Rhode Island Hazardous Waste Management Act, or the Federal Facilities Agreement.

It is RIDEM's understanding that NETC has proceeded with the development of plan and specifications, and that RIDEM would be receiving a draft of the plans and specs. on or about 7 June 1992. To date a copy has not been received by RIDEM. Please advise us if there will be a delay of more than 2 weeks from that date.

Please respond to the above comments within 30 days. If you have any questions please contact me at 277-2797.

Sincerely,

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

netccl4.1tr

cc: Carol Keating, EPA Region I
Franco LaGreca, NORTHNAVFACENGCOM
Paul Burgio, NORTHNAVFACENGCOM
Paul Kulpa, RIDEM