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U S NAVY RESPONSE TO U S EPA REGION I COMMENTS TO DRAFT SAMPLING AND
ANALYSIS PLAN ETHYL BLENDING PLANT TANK FARM 1 TRANSMITTAL NS NEWPORT RI

11/02/2011
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C-NAVY-11-11-4646

November 2, 2011

Project Number 112G02574

Ms. Kymberlee Keckler
U.S. EPA Region I
5 Post Office Square, Suite 100
Mail Code OSRR07-3
Boston MA, 02109-3912

Ms. Pamela Crump
Rhode Island Department of Environmental Management
235 Promenade St.
Providence RI 02908-5767

Reference: CLEAN Contract No. N62470-08-D-1001
Contract Task Order No. WE52

Subject: Transmittal of Response to Comments, Draft Sampling and Analysis Plan
Ethyl Blending Plant, Tank Farm 1
Naval Station Newport, Newport RI

Dear Ms. Keckler, Ms. Crump:

On behalf of Mr. Roberto Pagtalunan, U.S. Navy NAVFAC, I am providing to you enclosed a response to USEPA comments dated August 16, 2011 on the Draft Sampling and Analysis Plan (SAP) for the site referenced above.

If necessary, a technical conference call can be scheduled to discuss any outstanding comments. These responses to comments will be incorporated into the Draft Final SAP which will be issued following any technical discussion of the comments.

If you have any questions regarding this material, please do not hesitate to contact me.

Very truly yours,

Thomas A. Campbell
Project Manager

TAC/lh

encl.

c: R. Pagtalunan, NAVFAC Mid-Atlantic (w/encl.)
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S. Parker TtNUS (w/encl.)
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File G02574-3.2 (w/o encl.) File G02574-8.0 (w/encl.)

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**NAVY RESPONSES TO
U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA)
COMMENTS DATED AUGUST 16, 2011
ON THE DRAFT SAMPLING AND ANALYSIS PLAN (APRIL 2011)
FOR THE ETHYL BLENDING PLANT, TANK FARM 1 DATA GAPS ASSESSMENT
NAVAL STATION NEWPORT
NEWPORT, RHODE ISLAND**

Navy responses to the U.S. Environmental Protection Agency (EPA) comments on the Navy's responses of July 28, 2011 to EPA's comments on the Draft Sampling and Analysis Plan dated April 2011 for the Ethyl Blending Plant, Tank Farm 1 Data Gaps Assessment at the Naval Education and Training Center Superfund Site. The EPA comments are presented first (in italics) followed by Navy's responses.

General Comments:

***Comment 1:** Given that this is the initial effort to investigate groundwater at this site, EPA agrees with the initial monitoring well locations. However, EPA's concern remains that groundwater flow through fractured bedrock may not coincide with local flow directions as evidenced by groundwater contours. Therefore, the expectation is that a more comprehensive investigation of bedrock groundwater flow may be required to properly characterize this site. The absence of detected contamination in the proposed monitoring wells will not directly lead to a conclusion that site groundwater has not been impacted by site contamination without confirmation that there is a hydraulic connection between identified source areas and the monitoring wells.*

Response: Comment noted. Navy acknowledges that if a source of contamination is found, a more rigorous groundwater investigation may be needed

Specific Comments:

***Comment 2:** As was discussed during the conference call, the fact that the utilities are active does preclude their investigation for a release of a CERCLA contaminant. Tank Farm 1 is an inactive NPL site and therefore releases of contaminants there will be evaluated under CERCLA. The status of the location where the release occurs determines how the release is managed. Therefore, please include the investigation of the PCB releases in this SAP.*

Response: Navy agrees to conduct PCB sampling at the two transformer vault locations where PCBs have been previously detected during a 2010 Shaw sample event. Shaw sampling detected the presence of aroclor-1260 at transformer vaults 2 and 3 at concentrations of 24 mg/kg and 0.51 mg/kg, respectively.

Navy proposes to collect surface (0 to 1 foot) and subsurface (2 to 4 feet) soil samples in order to further characterize the extent of contamination. Soil sampling will be designed to confirm the PCBs in the two locations and to step out from each location in two horizontal directions and in the vertical (see attached figure). New soil boring locations will include one boring adjacent to the old location, and two borings 10 to 15 feet from the old locations with detections of PCBs. The sampling program has also been designed to determine if PCBs are present in subsurface soils by collecting subsurface soil samples from each location at the 2 to 4 foot below ground surface interval. Attached to this response to comment document is a proposed sample location map for transformer vaults 2 and 3 at Tank Farm 1.

***Comment 5:** The response is correct that no monitoring wells exist at the ethyl blending plant so the elevation of the groundwater table is unknown there. The text revision should also note that the groundwater surface upgradient of the ethyl blending plant (GT-105) is located in bedrock.*

Response: Comment noted. The text will be modified to reflect that groundwater may also be located in bedrock at the proposed upgradient monitoring well location.

***Comment: 8** The clarification should acknowledge that if the PSL is not achieved for an analyte, that will need to be considered for decision-making.*

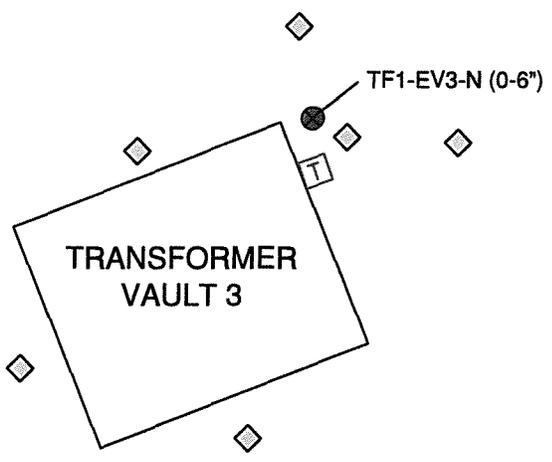
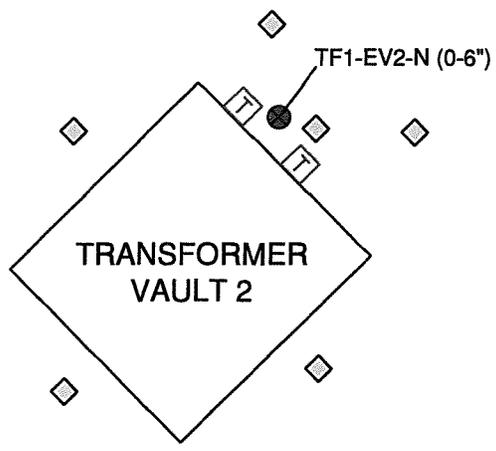
Response: Comment noted. The clarification will be modified as suggested in the comment.

Comment 26a: *As suggested in the responses, a site walkover should be conducted to confirm the suitability of the proposed sample locations relative to site features. Based on that, better locations may be identified that could move sample locations. Currently, EPA is not requesting any sample location changes.*

Response: Comment noted.

Comment 26b: *The revised Figure 5 provides better insight into how the sample locations were selected relative to the apparent release areas. The locations selected appear appropriate and will be confirmed during the field walkover.*

Response: Comment noted.



LEGEND

- ◆ PROPOSED BORING/SAMPLE LOCATION
- 2010 SAMPLE LOCATION - TO BE RESAMPLED
- T TRANSFORMER



PROPOSED TRANSFORMER VAULT SAMPLE LOCATIONS
 TANK FARM 1
 DATA GAPS ASSESSMENT
 NAVSTA NEWPORT
 PORTSMOUTH, RHODE ISLAND

SCALE NOT TO SCALE	
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