

N62661.AR.002494
NS NEWPORT
5090.3a

LETTER AND COMMENTS FROM U S EPA REGION 1 REGARDING DRAFT SAMPLING AND
ANALYSIS PLAN FOR TANK FARM 2 NS NEWPORT RI
06/03/2011
U S EPA REGION 1



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION I

5 Post Office Square, Suite 100
Boston, MA 02109-3912

June 3, 2011

Mr. Roberto Pagtalunan
NAVFAC MIDLANT (Code OPNEEV)
Environmental Restoration
Building Z-144, Room 109
9742 Maryland Avenue
Norfolk, VA 23511-3095

Re: Draft Sampling and Analysis Plan for Tank Farm 2

Dear Mr. Pagtalunan:

EPA reviewed the *Draft Sampling and Analysis Plan* for Tank Farm 2 at Naval Education and Training Center Superfund Site in Newport, Rhode Island, dated February 2011 (referred to as the SAP). The document presents the sampling design and rationale and the analytical and data assessment requirements for the project in accordance with the requirements of the *Uniform Federal Policy for Quality Assurance Plans* and *EPA Guidance for Quality Assurance Project Plans*. Detailed comments are provided in Attachment A.

Soil removal was required at Tank Farm 4 or 5 to remove lead-contaminated soil impacted by battery storage and maintenance activities. Do any such facilities exist at Tank Farm 2? If so, investigation of that area should also be included in this SAP as a Category 1 area.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Kymberlee Keckler".

Kymberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: Gary Jablonski, RIDEM, Providence, RI
Darlene Ward, NETC, Newport, RI
Steven Parker, Tetra Tech-NUS, Wilmington, MA

ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. 4, Executive Summary	<p>a) In the penultimate sentence in the first full paragraph, please correct <i>inches</i> to <i>feet</i>.</p> <p>b) In the third full paragraph a Remedial Investigation Report is mentioned. Section 11.4.1 only discusses a SASE report. Please clarify the intent.</p>
p. 10, Worksheet #5	Please change the organization chart to Kymberlee Keckler as the EPA RPM as in Worksheet #3.
p. 18, Worksheet #9	Regarding the comments for the November 17, 2010 scoping session, please determine if utilities are active because if they are not, sampling at the transformers should be included in this sampling plan.
p. 19, Worksheet #9	Please correct the projected date of sampling to July 2011.
p. 21, §10.3	The text at the bottom of the page discusses the discharge location of the tank ring drains stating the discharges are currently regulated and discharge to outfall #8. Please indicate where the ring drains previously discharged and if that/those locations have been previously investigated or when they will be investigated in this sampling program.
p. 33, §11.2.3	The last paragraph states that non-detected results greater than the PSLs will be treated as values less than the PSL for decision-making. Because the purpose of the sampling is to screen the site, the screening criteria should be selected to conservatively capture potential contamination rather than to eliminate potential contamination of concern. Therefore, this sampling and analysis program should be designed accordingly and non-detected results greater than the PSLs should be treated as exceedances or at a minimum as data gaps. Please edit the document accordingly.
p. 34, §11.3	Please clarify how the boundaries for the four Category 1 AOCs were established and transferred to the field. Data previously collected would have provided little insight regarding the boundaries because no exceedances of screening values were reported.
p. 34, §11.3.1	Regarding the third paragraph that discusses groundwater impacts, it is not apparent from review of Figures 2 and 3 that relevant groundwater monitoring wells are located in positions that would detect contamination from the Category 1 AOCs. Therefore, supplemental groundwater monitoring wells is necessary to confirm the absence of groundwater impacts from the Category 1 AOCs especially where the soil screening level concentrations are exceeded.

- p. 35, §11.4.1 No site-specific background data are available for PAHs and dioxins for the site and it is not appropriate to eliminate contaminants at this stage of investigation based on literature background values. Decisions for these contaminants in the Category 1 AOCs should be made without consideration to background and if background concentrations appear to be potentially relevant then further discussions and actions potentially including conducting a background study would be appropriate.
- p. 45, Worksheet 15a This worksheet identifies RIDEM's upper concentration limit (UCL) as the project screening level for a number of the listed analytes. The UCL was selected as the lowest applicable RIDEM criterion primarily because no specific leachability or direct exposure value was available in the RIDEM regulations. However, RIDEM's requirement to achieve an excess lifetime cancer risk of no more than 1×10^{-6} and a cumulative excess lifetime cancer risk of no more than 1×10^{-5} must be satisfied for Category 2 locations. Similarly, the non-cancer thresholds for RIDEM must also be satisfied. It is not apparent that the UCL concentrations especially when applied to surface soil achieve these thresholds and therefore they may not be acceptable project screening levels especially if multiple contaminants are present. A more in-depth analysis appears warranted depending on the results of the analyses.
- p. 79, Worksheet #27 Please correct the typos in the last sentence under Field Duplicates. Change *TF4* to *TF2* in two places. Also correct the example under Rinsate Blanks: *081* should be *0811*.
- p. 97, Worksheet #30 Please correct the following methods to be consistent with the methods specified in Worksheet #19: change *8015D* to *8015C* in two places; and delete *6010C*.
- p. 105, Worksheet #36 Please correct the following methods to be consistent with the methods specified in Worksheet #19: change *8015D* to *8015C*; and delete *6010C*.
- Figure 4 To be complete, this conceptual model should also include airborne migration of sludge burning byproducts, although the potential impacts of that, if any, are not investigated in the scope of this SAP.
- Figure 5 The earlier sampling locations have been sampled only with Retroflag screening, so those results do little to characterize the AOC for PAHs, dioxins, and metals. Also, there is concerned that most proposed sample locations (five of seven) are actually outside of the AOC boundary, therefore the proposed sampling plan would have only two locations within the AOC where analyses are available for the contaminants of concern. This is not acceptable to EPA. Please add sampling locations in the center of each of the four grid squares to better characterize soil within the AOC boundary. Use those four samples plus TF2-SB1006 to characterize the AOC and consider holding the

proposed peripheral samples until the analytical results for the five samples within the AOC have been assessed to determine if analysis of the peripheral samples is required to define the extent of contamination.

Figure 6

The same concerns expressed for AOC-001 in Figure 5 are present for the sampling plan for AOC-003. The only previous sampling results are for Petroflag screening and DRO analysis. Therefore, please add sample locations at the center of each grid square and at the center of the AOC. Those three locations plus locations TF2-SB1008 and TF2-SB1011 should be used to characterize this AOC. Consider holding the proposed peripheral samples until the analytical results for the five samples within the AOC have been assessed to determine whether analysis of the peripheral samples is required to define the extent of contamination.

Appendix A, Table A-1

a) This table has a column labeled "Exceedances," but there is no indication provided as to what criteria were exceeded. Please indicate what the exceedance criteria were for each area discussed.

b) Several areas are said to have had significant staining, but they have not been identified as areas where open burning occurred and are not proposed for further sampling. Please clarify how which areas had open burning and which did not was determined. Aerial photography alone is not definitive enough to rule out open burning. Why wouldn't the same operations have been performed at each of the tanks? What is different about the tanks where open burning has been identified?

Appendix A, Table A-3.1

This table indicates that well GZ-226 was sampled on March 11, 2005, but Table A-2 does not include GZ-226 in the list of wells sampled March-May 2005. Please correct.

Appendix A-4

This appendix suggests literature-based background concentrations for PAHs and dioxins in soil for use at Tank Farm 2. The proposed values for PAHs are based on samples collected from urban areas much larger and more densely populated than that in the vicinity of Tank Farm 2. Further, the proposed background values result in a potential cumulative risk for industrial exposure in excess of RIDEM's criterion of 1×10^{-5} excess lifetime cancer risk based on Regional Screening Level concentrations. Decisions for these contaminants in the Category 1 AOCs should be made without consideration to background and if background concentrations appear to be potentially relevant, then further discussions and potentially a background study would be appropriate.

Appendix B, Table B-2

There is inconsistency between this table and Table B-1. Table B-1 assumes residential exposure, but Table B-2 assumes industrial/commercial exposure only. Please explain this difference or make the exposures consistent.

Appendix E-2, p. L-2-2 At the bottom of the page, reference is made to 4°C, but the SAP indicates that 6°C is the target sample temperature. Please correct.