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LETTER AND COMMENTS FROM U S EPA REGION 1 REGARDING DRAFT ANNUAL  
MONITORING REPORT MCALLISTER POINT LANDFILL 2010 NS NEWPORT RI  
8/8/2011  
U S EPA REGION 1



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 1  
5 POST OFFICE SQUARE, SUITE 100  
BOSTON, MASSACHUSETTS 02109-3912

August 8, 2011

Maritza L. Montegross  
Remedial Project Manager  
NAVFAC MIDLANT, Code OPNEEV  
9742 Maryland Avenue, Bldg. Z-144  
Norfolk, VA 23511-3095

Re: Draft Annual Monitoring Report  
Operation and Maintenance Activities 2010  
McAllister Point Landfill – Naval Station Newport, Middletown, RI  
June 2011

Dear Ms. Montegross:

EPA has reviewed the document entitled "Draft Annual Monitoring Report, Operation and Maintenance Activities 2010, McAllister Point Landfill – Naval Station Newport, Middletown, RI," dated June 2011. The document was prepared by H&S Environmental, Inc. for the Navy.

The document presents the findings of the long-term monitoring activities required by the Long-Term Monitoring Program Work Plan (October 2005) and Work Plan Addendum (August 2010) and discusses the operation and maintenance actions performed to ensure that the remedy remains protective. The Draft 2010 Annual Report was reviewed for completeness, technical accuracy, and consistency. In addition, the document was reviewed to verify the requirements of the Work Plans were satisfied. Enclosed are EPA's comments on the draft report.

If you have any questions, please contact me at (617) 918-1754 or at [lombardo.ginny@epa.gov](mailto:lombardo.ginny@epa.gov).

Sincerely,

A handwritten signature in cursive script that reads "Ginny Lombardo".

Ginny Lombardo  
Remedial Project Manager

cc: Pamela E. Crump, RI DEM  
Darlene Ward, NAVSTA Newport  
Stephen Parker, TtNUS  
Chau Vu, EPA

Bart Hoskins, EPA  
Greg Kemp, Mabbett & Associates, Inc.  
Ken Finkelstein, NOAA  
Ken Munney, USF&W

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**EPA Comments on  
Draft Annual Monitoring Report  
Operation and Maintenance Activities 2010  
McAllister Point Landfill  
June 2011**

**GENERAL COMMENTS:**

1. Landfill gas screening is required to be conducted in the summer. The 2010 screening was performed on June 4, which is not summer, although close. Landfill gas screening (and sampling) should be conducted in the summer and preferably later in the summer after the effects of the warmer weather have taken place.
2. All the figures show elevation data relative to mean sea level. The October 2005 Long-Term Monitoring Plan (LTMP) requires that all elevation data be presented relative to Mean Low Water (MLW) so that direct comparisons could be made between older and newer data. It is not apparent that this has been done. Please review and comment on the current status of all elevation data relative to the LTMP requirements. If the data have not been converted to the MLW datum as required, Navy needs to ensure that this is the case for the next annual report.

**SPECIFIC COMMENTS:**

1. Page 1-3, §1.0: Please delete the second bullet from the group at the bottom of the page because landfill gas sampling was not conducted in 2010.
2. Page 2-2, §2.1.1: As noted in prior comments by EPA, the LEL for methane is 5% by volume measured in air; however, the LEL changes if measured in a mixture of gases (e.g., low oxygen concentrations). Therefore, please revise the first sentence in the second full paragraph on this page to acknowledge that fact. Also, edit the third sentence in this paragraph by changing 15% (the UEL) to 5% (the LEL).
3. Page 2-8, §2.4.1.3: Please edit the second full sentence on this page to read: "Prior to the increase in 2010, the naphthalene results at MW-103S *had* steadily decreased, ...."
4. Page 3-4, §3.4: In the third paragraph, please change November 2009 to November 2010. Also, the text indicates that several locks were missing, cut, or no longer locked. This was not noted in the text discussing the June inspection. Where the damages to the locks caused during the June inspection? Or, is this evidence of vandalism?
5. Page 3-7, §3.9: In the partial paragraph at the top of the page, clarify what datum the survey was conducted in, what datum the fire hydrant elevation is based on, what datum the survey data were converted to, what the conversion value was, and what datum the data are presented in on the Site Plan/figures. There appear to be inconsistencies between the text and the figures. Note that the LTMP required that all elevation data (old and new) be presented relative to the MLW datum.
6. Page 3-7, §3.9: The first full paragraph on this page discusses the settlement observed based

on the survey data. A cumulative settlement of 1.36 feet at MW-11S is noted. Please discuss the significance of this value and whether further investigation or remedial action is warranted. If none is warranted, please indicate what threshold Navy believes is appropriate to trigger further investigation.

7. Page 3-8, §3.11: Please edit the first sentence in this section as follows: “Based on the findings of the June 2010 inspection, H&S conducted the following maintenance activities in October 2010:”. As written this section was intended to discuss only the October 2010 maintenance activities; May 2010 maintenance activities were discussed in the previous section.
8. Page 4-1, §4.0: Please edit the last sentence in this section to read: “... Project Objectives *are being* successfully achieved.” This is an on-going process.
9. Page 4-1, §4.1: To clarify the intent, please edit the last sentence of the white bullet to read: “..., leachate generation was not apparent based on groundwater sampling results.” If some other meaning was intended, please edit the sentence to reflect that more clearly.
10. Page 4-5, §4.2: In the last white bullet in this section it is stated that HAP landfill gas emissions are well below the major source criteria and the NESHAP landfill requirements, and that the RIDEM AALs are not exceeded. If calculations are provided to support these statements, please reference where they are provided. If they are not provided, please provide them.
11. Page 4-6, §4.3: Please edit the bullet at the top of the page to clarify the monitoring requirements. Ambient perimeter screening is still required annually but ambient perimeter sampling is only required every five years, together with landfill gas vent sampling.
12. Table 3-1: Please clarify the table note regarding the vertical datum information. As written it is not clear what datum was used for the elevation data presented (one table note states that all elevations are relative to mean sea level). Please explain the conversion of 1.08. Are the elevation differences based on using the same datum for the comparisons? Note that the LTMP required that all elevation data be presented relative to the MLW datum.
13. Table 3-2: Same comment as for Table 3-1.
14. Table 3-3: The table note states that the elevation data are relative to mean sea level. Note that the LTMP required that all elevation data be presented relative to the MLW datum. Please confirm that the horizontal data presented in this table are based on NAD 1983 if correct. Please explain why so many of the elevations between December 2005 and November 2006 are significantly different.