

N62661.AR.002503  
NS NEWPORT  
5090.3a

LETTER AND U S EPA REGION 1 EVALUATION OF U S NAVY RESPONSE TO COMMENTS  
REGARDING DRAFT SAMPLING AND ANALYSIS PLAN FOR ETHYL BLENDING PLANT  
TANK FARM 1 DATA GAPS ASSESSMENT NS NEWPORT RI  
8/16/2011  
U S EPA REGION 1



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION I**

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

August 16, 2011

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

Re: Responses to EPA's Comments on the Draft Sampling and Analysis Plan for the Ethyl Blending Plant, Tank Farm 1 Data Gaps Assessment

Dear Mr. Pagtalunan:

EPA reviewed 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 document presents the sampling design and 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.

GC1: 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.

I look forward to working with you and the RIDEM toward the cleanup of the Ethyl Blending Plant. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,

Kymerlee Keckler, Remedial Project Manager  
Federal Facilities Superfund Section

Attachment

cc: Pam Crump, RIDEM, Providence, RI  
Deb Moore, NETC, Newport, RI

## ATTACHMENT A

<u>Comment #</u>	<u>Comment</u>
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.
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.
8	The clarification should acknowledge that if the PSL is not achieved for an analyte, that will need to be considered for decision-making.
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.
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.