

N62661.AR.002504  
NS NEWPORT  
5090.3a

LETTER AND U S EPA REGION 1 EVALUATION OF U S NAVY RESPONSE TO COMMENTS  
REGARDING DRAFT DATA GAPS ASSESSMENT TANK FARMS 4 AND 5 NS NEWPORT RI  
8/22/2011  
U S EPA REGION 1



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

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

August 22, 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 Data Gaps Assessment Report for Tank Farms 4 & 5

Dear Mr. Pagtalunan:

Thank you for the opportunity to review the responses, dated July 28, 2011, to EPA's comments on the Draft Data Gaps Assessment Report for Installation Restoration Site 12 (Tank Farm 4) and 13 (Tank Farm 5) Category 1 Areas at the Naval Education and training Center Superfund Site. The document presented the results of the field investigations conducted to collect additional site data, a discussion of the nature and extent of contamination identified, completion of human health and ecological risk assessments, and a summary and conclusions for this investigation for Tank Farms 4 and 5. Detailed comments are provided in Attachment A.

To clarify the resolution, EPA agreed that the Data Gaps report could be completed using the data collected in accordance with the Data Gaps QAPP/SAP and the "Technical Memorandum for Data Summary and Plan for Risk Assessment." The Navy will need to address the locations where contamination was previously identified but that could not be incorporated into the risk assessment because of insufficient analytical information or incomplete location information.

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

Sincerely,

Kymberlee Keckler, Remedial Project Manager  
Federal Facilities Superfund Section

Attachment

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

## ATTACHMENT A

| <u>Page</u>              | <u>Comment</u>   |
|--------------------------|--|
| 1. p. 1-2, §1.2          | The text was not changed for the Draft Final. The change will be made in the final report. Please explain how there can be a non-CERCLA release of CERCLA contaminants at an NPL site, which is what is implied by the description of the Category 3 Decision Units (DUs). This is possible if there is no CERCLA risk, but it is not clear how the Navy would know the risk level without first investigating the site.   |
| 2. p. 1-3, §1.3.2        | a) The agreed change was not made for the Draft Final document.<br><br>b) As discussed during a conference call on August 18, 2011, EPA will not require that the discussion state that funding was the primary reason for terminating the 2004-5 investigation and Navy will not state that funding was not the primary reason. The word 'primary' will be deleted.<br><br>c) The first sentence was not deleted from the text but it will be deleted in the Final Data Gaps Assessment Report.   |
| 49. Appendix A, Figure 6 | Please annotate this figure to make it clearer. It appears that the <i>Next Steps</i> referenced relate to steps required before the Data Gaps Investigation.  |
| 50. Appendix A, Figure 7 | It is important to make decisions with the correct information. When the valve in the line from Tank 41 to Ruin 2 was closed by TtEC, that the line began leaking upstream of the valve. EPA's representative and RIDEM witnessed this while conducting oversight at Ruin 2 during the removal action. The oil in Ruin 2 indicates that oil had been present in the subsurface at Tank 41 and it had been transported to Ruin 2. Therefore, there may be a continuing source because of the leak in the pipeline and residual oil in the subsurface at Tank 41. There is uncertainty because the area around the leak has not been investigated. EPA does agree that such a leak could be considered Category 2. |
| Appendix A, Figure 8     | As documented in the Final Closeout Report for Sludge Disposal Trenches and Review Areas at Tank Farms 4 and 5, the issue of lead in soil along the fence line was not resolved. Further discussions are required to reach a consensus. The lead concentrations along the fence lines are extremely elevated and cannot be disregarded as the Navy takes action to remediate this area.  |