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LETTER AND U S EPA REGION 1 EVALUATION OF U S NAVY RESPONSE TO COMMENTS
REGARDING DRAFT SAMPLING AND ANALYSIS PLAN FOR TANK FARM 3 DATA GAPS
ASSESSMENT NS NEWPORT RI
9/16/2011
U S EPA REGION 1



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION I

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

September 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 - Data Gaps
Assessment for Tank Farm 3

Dear Mr. Pagtalunan:

Thank you for the opportunity to review the responses, dated August 26, 2011, to EPA's comments, dated June 3, 2011, for the Draft *Sampling and Analysis Plan* for Tank Farm 3 (SAP). The SAP 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.

GC2. Although groundwater flows downgradient, a well placed in bedrock downgradient of a source area may not detect contamination from that source area. Evidence that the downgradient well actually intercepts groundwater migrating from the source area is needed. If there is no source area, then there is little concern for downgradient groundwater contamination. Based on presently available information, collecting samples from the proposed wells and getting no detections does not establish that groundwater has not been impacted. If a source of contamination is found, a more rigorous groundwater investigation will be needed.

GC5. Dioxin is a potential contaminant of concern for AOC-001 and there is an MCL for dioxin. Therefore if dioxin is detected in the source area, sampling of groundwater for dioxin will be required. Because EPA is concerned about the appropriateness of the groundwater wells proposed for monitoring (see GC2), dioxin sampling for groundwater can be postponed until more information is available for the site.

Pursuant to Section 7.2 of the Federal Facilities Agreement, the Navy is required to meet to informally dispute any unresolved issues on a draft primary document and then issue a draft final document *after* the informal dispute resolution period. For the Tank Farm 3 site, the draft final document was issued concomitant with the responses to comments on the draft thereby usurping any opportunity for informal dispute resolution. EPA is therefore requesting that the Navy revoke and reissue the draft final document after the Parties have had a chance to resolve differences.

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 or wish to arrange a meeting.

Sincerely,

Kymerlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

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

ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. 38, §11.3.3	Please change GZ-328 to GZ-318 throughout the Appendices (C and E).
Figure 3	<p>d) The response does not address the concern. At some point in time the BSW line discharged to the brook and no samples have been included in this investigation at or downgradient of that discharge point. Please clarify why this is not a data gap?</p> <p>e) Please correct the reference to TtEC 2004 in the Legend to TtEC 2005 as the response indicates.</p>
Figure 4	b) Please correct the reference to TtEC 2004 in the Legend to TtEC 2005.