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LETTER AND COMMENTS FROM U S EPA REGION 1 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: Draft Final Sampling and Analysis Plan - Data Gaps Assessment for Tank Farm 3

Dear Mr. Pagtalunan:

Thank you for the opportunity to review the Draft Final *Sampling and Analysis Plan* for Tank Farm 3 at Naval Station Newport, Newport, Rhode Island, dated August 2011 (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.

As discussed in my letter to you dated September 16, 2011 on the responses to EPA's comments on the draft SAP, concerns remain regarding the effectiveness of the proposed groundwater monitoring wells to detect contamination from upgradient sources. In the wells targeted for sampling, groundwater is at the bedrock elevation in one and six to fourteen feet below bedrock in the other two. Therefore, there is significant uncertainty that the targeted wells will intercept groundwater migrating from the respective Category 1 Areas.

Please retain the soil to groundwater SSLs as PSLs. Because of the uncertainty regarding the effectiveness of the bedrock wells to intercept groundwater from upgradient contaminated areas, it is necessary to retain the soil to groundwater SSLs to eliminate groundwater as a medium of concern. Detecting no contamination in the groundwater wells proposed for sampling will not in itself eliminate groundwater as a medium of concern.

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. 3, Executive Summary, ¶5	It is not clear how Category 3 areas will be regulated. Therefore, please revise the second sentence to read: "Category 3 areas, which may be areas regulated...."
p. 24, §10.2	In the discussion of AOC 001, the penultimate sentence mentions the existence of a stripper pit within the boundary of AOC 001. Please confirm the location of this stripper pit on the site drawings and expand the background information about this feature. While it appears that this feature would not be a Category 1 area, further discussion is warranted to determine if it is necessary to formalize the investigation in this SAP.
p. 25, §10.3	The last paragraph states that groundwater flows northerly in the western portion of the site. Owing to a decrease in the well density on the western portion of the site, the groundwater flow direction is somewhat uncertain and not clearly in a northerly direction. This potentially impacts the viability of GZ-314 as an appropriate downgradient well for monitoring AOC 020.
p. 29, §10.4.3	Please correct the two references to TtEC, 2004 that should apparently be to TtEC, 2005.
p. 30, §10.5	The second white bullet states that groundwater flow at the burning pit is to the northeast. However, the groundwater contours added to Figure 2 for this Draft Final SAP suggest that groundwater flows to the north at the burning pit. Therefore, it is not clear that GZ-301 is appropriately located downgradient of the burning pit to detect potential migrating contaminants.
p. 42, Worksheet 12	For clarity, the Frequency for Trip Blanks should be identified as "One Each per Cooler, As Appropriate." EDB analysis (8011) is also required when samples are shipped that require EDB analysis by method 8011 to achieve the appropriate detection limits for EDB in the trip blank.
p. 52, Worksheet 15a	a) EPA does not concur with the elimination of soil to groundwater SSLs as PSLs because of the aforementioned concern regarding the effectiveness of the bedrock wells to capture migrating contamination. b) Please clarify why previously-listed ecological SSLs were removed from the dioxins/furans list when several of those ecological SSLs are lower values than the soil to air SSLs now presented in this table. c) Please clarify Footnote 8 for iron.
p. 66, Worksheet 17	The second paragraph under AOC 020 states that the subsurface soil sample will be collected from the four to six foot depth interval, which is not consistent with the subsurface sampling proposed for Building 227 where the

subsurface sample will be collected from the two to four foot interval. Did a subsurface release occurred at AOC 020? If not, then it is more appropriate to designate the two to four foot depth interval for sampling if a fixed interval is to be sampled as a surface release is more likely to be detected in that interval. If the deeper four to six foot depth interval is sampled with no detection, contamination at a shallower depth could be overlooked.

p. 67, Table 17-1

a) Please correct the depth of the borings for AOC-001. As indicated in Worksheet 17, all borings will be completed to bedrock, which may differ from ten feet below grade.

b) Please confirm that GZ-318 is the well proposed for sampling for Building 227, or provide the correct well. Appendices C and E indicate that well GZ-328 will be sampled.

p. 68, Worksheet 18

a) Please correct the soil boring identification numbers presented in this worksheet. All three AOCs have the same boring numbers.

b) For clarification, please break the sediment samples for AOC-001 into two separate line items because dioxin sampling is not proposed for the three deep sediment samples.

c) Footnote 3 applies to EDB so it should be deleted from the Depth column in three places. If a note to describe the depth variations is intended it should be added.

p. 70, Worksheet 19

a) For the aqueous samples, please add trip blank analyses. They have not been identified in this table.

b) Footnote 6 should also indicate that EDB analysis (8011) is also required when samples are shipped that require EDB analysis by method 8011 in order to achieve the appropriate detection limits for EDB in the trip blank.

p. 72, Worksheet 20

a) Please correct the total number of samples sent to the lab for PCBs and metals in groundwater to be 4 for each, not 3.

b) Please edit Footnote 4 to ensure the intent is clear. When samples are shipped that require EDB analysis by method 8011 a trip blank designated for EDB analysis by method 8011 must accompany that sample to achieve the appropriate detection limits for EDB in the trip blank. Note also that although this footnote references Worksheet 19, which does not currently discuss trip blanks (see above).

Figure 2

Based on the text added to Section 10.2 of the SAP it appears that the feature identified in this figure as "14' x 14' stripper valve point" is actually the stripper pit referred to in Section 10.2. Please confirm and correct the description on the figure.

Figure 3

The reference in Note 1 was changed from TtEC, 2004 to TtEC, 2005 but the

same reference was not changed in the Legend. Note that there is no TtEC, 2004 listed in the Reference section.

Figure 4

Please correct the reference in the Legend from TtEC, 2004 to TtEC, 2005 because there is no TtEC, 2004 listed in the Reference section.

Appendix C, §3.0

In the third bullet of the first paragraph GZ-328 is identified as the well to be sampled at Building 227. However, Table 17-1 in the SAP identifies GZ-318 as the well to be sampled at Building 227. Please clarify.

Appendix E

Well logs are provided for GZ-301, GZ-314, and GZ-328. If GZ-328 is not the well to be sampled for Building 227, please add the well log for the well that will be sampled.