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LETTER AND COMMENTS FROM RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL
MANAGEMENT REGARDING DRAFT FINAL SAMPLING AND ANALYSIS PLAN FOR DATA
GAPS ASSESSMENT FOR TANK FARM 1 NS NEWPORT RI

3/26/2012

RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

Parker, Stephen

Rec'd AP

From: Pamela Crump <pamela.crump@DEM.RI.GOV>
Sent: Monday, March 26, 2012 11:40 AM
To: Pagtalunan, Roberto P CIV NAVFAC MIDLANT, IPTNE
Cc: Matthew Destefano; Richard Gottlieb; Gary Jablonski; Campbell, Thomas; Parker, Stephen; keckler.kymerlee@epamail.epa.gov; Ward, Darlene B CIV NAVFAC MIDLANT, PWD Newport
Subject: Draft Final SAP - Tank Farm 1
Importance: High

Roberto,

RIDEM has reviewed the Draft Final Sampling and Analysis Plan for the Data Gaps Assessment for Tank Farm 1. RIDEM does not concur fully with this SAP and would like to informally dispute the issues listed below.

1) Additional Areas of Concern (AOCs)

RIDEM identified several AOCs at Tank Farm 1 that have not been properly investigated and could potentially contain CERCLA contaminants (refer to Comment #2). RIDEM requested that these areas be included in this SAP as potential Category 1 areas. The Navy stated that further investigation of these additional areas would be determined after the completion of Shaw's investigation. Therefore, in an effort to allow the cleanup of Tank Farm 1 to move forward, RIDEM is proposing that the Navy revise this Sampling and Analysis Plan for the Data Gaps Assessment of Tank Farm 1 to be a Phase I - Limited Investigation of Tank Farm 1 Ethyl Blending Plant and Transformer Sites only. This will allow the Navy to move forward with the sampling and analysis of the ethyl blending plant and transformers while discussions are held between all parties regarding the other potential AOCs. Please consider this proposal to avoid further delay of the cleanup of Tank Farm 1. If the Navy agrees to this proposal, the report must state in every section including the cover page that this is a limited investigation (Phase I) for the ethyl blending plant and transformers only.

2) Sampling for TPH

RIDEM requested that the Navy add TPH to the analyte list in this SAP since the ethyl fluid was blended with aviation fuel, and kerosene was used as a cleaning agent for any spills associated with the blending operations. Sampling for TPH will indicate areas of potential releases and spills. The Navy stated that they will not include sampling for TPH because it is not a CERCLA contaminant. Please be advised that according to the Dispute Resolution Agreement dated January 12, 2012, more stringent state ARARs need to be addressed. The RI *Remediation Regulations* contain standards for TPH and these are applicable standards for Tank Farm 1, since this was a storage site for fuel oil. Please also note that sampling for TPH was included in the previous site investigations of Tank Farms 4 & 5. RIDEM requests that the SAP be revised to include sampling for TPH at all sample locations.

3) Test Pits vs. Borings

RIDEM requested that the Navy install a series of test pits in addition to borings to allow the observation of any staining, product, etc. to determine the best location for sampling. RIDEM is aware

that Shaw's previous investigations included test pits in the vicinity of the Ethyl Blending Plant. However, based on the photographs provided in the Navy's response to comments, the ethyl blending plant contains a boiler, an unknown pit on the southeast side of the building and a tank vent pipe. If there is an underground storage tank in the vicinity of the ethyl blending plant the tank must be removed in accordance with the RIDEM Underground Storage Tank requirements. Borings are not appropriate investigation methods for locating the tank or associated pipelines. Further, borings can easily penetrate a tank or fuel line resulting in a potential release of product. A backhoe can be used to confirm and track the presence of underground pipes and tanks. In addition, test pits can safely uncover a storage tank or fuel line without damaging the structures. Similarly, if there is a leach field at the site with or without an associated holding tank, test pits are better designed to easily and safely investigate these structures. Please include provisions in this SAP to further investigate these areas with test pits.

4) Additional Sample Locations (Ethyl Blending Plant)

As specified in RIDEM's comment #8, we requested that the SAP include investigations near outside doorways, dry wells, sumps, floor drains, and any discharge pipes from the building. Since the Navy is planning a site walk with EPA and RIDEM to verify sample locations, it would seem prudent to include additional sampling for any locations which may be discovered during this site walk such as those stated above, since these are all potential areas of contamination. Please include in this SAP a statement that additional sampling locations shall be included based on the recommendations from the regulators during the site walk for the ethyl blending plant. In addition, it is recommended that the Navy review their files and have a copy of the engineering plans for the site walk over.

RIDEM hopes the Draft Final document will have this information included. We hope that all parties are willing to work together to ensure that Tank Farm 1 is cleaned up effectively to protect human health and the environment and we are not forced to elevate these extremely important issues further.

If you have any questions regarding this email, please feel free to contact me at anytime.

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