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LETTER AND COMMENTS FROM U S EPA REGION I REGARDING DRAFT DATA GAPS  
REPORT SITES 4 AND 5 NS NEWPORT RI  
2/23/2012  
U S EPA REGION I

## **Parker, Stephen**

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**From:** Kimberlee Keckler <Keckler.Kimberlee@epamail.epa.gov>  
**Sent:** Thursday, February 23, 2012 12:30 PM  
**To:** Seiken, Dabra; roberto.pagtalunan@navy.mil  
**Cc:** deborah.j.moore@navy.mil; pamela.crump@DEM.RI.GOV; Parker, Stephen  
**Subject:** Re: Newport Tank Farms 4 and 5 Draft DGA Report

Thank you for the Data Comparison Submittal provided in support of the Data Gaps Assessment Report for Tank Farms 4 and 5. The data comparison submittal presents tables and figures that summarize the analytical data that have been collected at the two tank farms. EPA understands that the purpose of the submittal is to demonstrate that the analytical results for the pre-2010 confirmation samples are generally less than or equal to the analytical results for the Data Gaps Assessment samples for the CERCLA contaminants of Tetra Tech offered the data comparison analysis to try to demonstrate that its decision to dismiss some of the findings of the investigations described in the Closeout Report for Sludge Disposal Trenches and Review Areas at Tank Farms 4 and 5 was justified. As indicated below, EPA does not believe that Navy has fulfilled its obligation to adequately investigate the Tank Farm 4 and 5 sites or its prior commitments to remove remaining contaminated soil from the Tank Farm 4 Ruin 1 discharge area. EPA maintains that areas of known contamination at the Tank Farm 4 Ruin 1 discharge area have not been analyzed for CERCLA contaminants of concern.

1. The data submittal shows that the analytical results for the pre-2010 confirmation samples are generally less than or equal to the analytical results for the Data Gaps Assessment samples for the CERCLA contaminants of concern (COCs). However, the confirmation samples were collected from the residual soil in excavated areas to demonstrate that the contaminated soil had been removed, and consequently, the pre-2010 confirmation samples are not representative of soil at locations that have not been excavated to remove the contaminated soil. Therefore, the comparison of the pre-2010 confirmation samples to the Data Gaps Assessment samples provides no information about locations where contaminated soil is known to exist.
2. Numerous locations still exist at Tank Farm 4 where contaminated soil remains in place based on Petroflag screening for TPH, laboratory analysis for TPH, and visual and olfactory evidence of contamination. As documented in the Closeout Report for Sludge Disposal Trenches and Review Areas at Tank Farms 4 and 5, the Navy is aware of contamination south of the southwestern extent of the excavated area where visibly contaminated soil exists in a lens up to one foot thick and where a berm filled with debris was left in place. The extent of this contamination has not been investigated. The Navy is also aware that on the northwestern end of the excavation visual and olfactory evidence of contamination was found in several test pits and that the contaminated soil has not been removed or analyzed for CERCLA COCs. Additional exploratory soil samples collected from the perimeter of the Ruin 1 discharge area of excavation in 2006 also indicated the presence of contaminated soil that has not been removed or investigated for the presence of CERCLA COCs. Because these areas of

known contamination have not been analyzed for CERCLA COCs as was required by the Site Investigation Work Plan for Sludge Disposal Trenches and Review Areas at Tank Farms 4 and 5, it is unknown whether the areas with elevated concentrations of TPH also contain elevated concentrations of CERCLA COCs.

3. As documented in the February 17, 2006, meeting minutes in the Closeout Report for Sludge Disposal Trenches and Review Areas at Tank Farms 4 and 5, Tetra Tech EC stated that no confirmation samples were collected from the southern excavation boundary "... because future excavation is scheduled in the general TF Ruin 1 area and upon completion, the entire excavation sidewall will be samples (sic) as per the work plan." Tetra Tech EC further stated that "... TtEC has decided to perform testpitting northwest of sample TF4-C-STRAIGHTDIS-54-S before they begin excavation in this area to delineate the extent that will be required. She added that excavation associated with samples TF4-C-STRAIGHTDIS-53-S and TF4-C-STRAIGHTDIS-52-S is still required due to [TPH]> 500 ppm." Neither the excavations mentioned nor the confirmation sampling were completed before suspending the field effort, and consequently, the requirements of the work plan were not completed.
  
4. Please refer to the Unresolved Issues List presented in Appendix C of the Closeout Report for Sludge Disposal Trenches and Review Areas at Tank Farms 4 and 5 for a comprehensive list of issues that remain a concern for Tank Farms 4 and 5 and that will need to be addressed in order to close these sites.

Kymerlee Keckler, Chemical Engineer  
Federal Facilities Superfund Section  
U.S. Environmental Protection Agency, Region 1  
5 Post Office Square, Suite 100  
Mail Code: OSRR07-3  
Boston, MA 02109-3912

Telephone: 617.918.1385  
Facsimile: 617.918.0385  
E-mail: keckler.kymerlee@epa.gov

From: "Seiken, Dabra" <Dabra.Seiken@tetrattech.com>  
To: Kymerlee Keckler/R1/USEPA/US@EPA, "pamela.crump@DEM.RI.GOV" <pamela.crump@DEM.RI.GOV>, "pamela.crump@DEM.RI.GOV" <pamela.crump@DEM.RI.GOV>  
Cc: "steinberg@mabbett.com" <steinberg@mabbett.com>, "Pagtalunan, Roberto P CIV NAVFAC MIDLANT, IPTNE" <roberto.pagtalunan@navy.mil>, "deborah.j.moore@navy.mil"