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NS NEWPORT
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EMAIL REGARDING REGULATORY COMMENTS ON MARCH 2011 MONITORED NATURAL
ATTENUATION SAMPLING TECHNICAL MEMORANDUM AT SITE 8 NETC NEWPORT RI
6/22/2011
RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

Ropp, Jim

From: Gary Jablonski <gary.jablonski@DEM.RI.GOV>
Sent: Wednesday, June 22, 2011 11:06 AM
To: Ropp, Jim; maritza.montegross@navy.mil
Cc: Lombardo.Ginny@epamail.epa.gov; Moore, Deborah J CIV NAVFAC MIDLANT, PWD
Newport; steinberg@mabbett.com; Kenneth_Munney@fws.gov; Matthew Destefano; Pamela Crump
Subject: Newport NUSC (Site 08) March 2011 MNA sampling tech memo
Categories: Newport

Maritza and Jim,

This Office has conducted a review of the March 2011 MNA Groundwater Sampling Results received on 26 May 2011. As a result of this review, this Office has the following comments in regards to this document:

1. Page 3, 1st bullet; first sentence: *“Limited historical sampling events are available to develop trend graphs and/or perform statistical evaluations.”* This Office concurs with this statement and requests that the Navy continue to perform quarterly sampling in order to collect sufficient data to be able to establish seasonal and statistical trends for this Site. This means groundwater sampling should be performed in June 2011, September 2011, December 2011, March 2012, etc...
2. Page 3, 1st bullet; 4th paragraph: *“This may indicate a reduction in the plume footprint at the fringes (to be confirmed through further groundwater monitoring).”* MW-125B was only sampled for one other time in 07/31/08 and MW-122 was sampled for 2 other times in 06/03/08 and 06/30/10. The sampling periods are approximately three years apart and not collected in the same quarter. It could also indicate a seasonal change. Please remove this statement from the document due to the fact that insufficient number of sampling rounds has been collected for these two wells to draw any conclusion.
3. Page 4, 1st bullet: This bullet of the report discusses the concentrations of the various chlorinated solvents (tetrachloroethene, trichloroethene, dichloroethene, vinyl chloride, etc) and the associated concentrations as supportive of the breakdown of tetrachloroethene or trichloroethene. This analysis would be straight forward at a site in which tetrachloroethene and trichloroethene were the only known compounds disposed of at a site. Unfortunately, all of these chlorinated solvents are materials which may have been disposed of at this site and thus are not necessarily break down products. The report should clearly state this fact in this section.
4. Page 4, 3rd bullet: This bullet discusses the chloride concentrations at various locations across the site. The report should include a statement that the assessment of chloride concentrations in the landfill is complicated by the fact that typically in landfills chlorinated solvents are not the only source of chlorides.
5. Page 5, 1st bullet: The report notes that the methane concentrations at the site are indicative of favorable reducing conditions. The report should also note that there are other sources (known former landfill) of methane present at the site which complicates this analysis.
6. Page 5, 2nd bullet: The report notes that TOC is measured to see if hydrogen could be available for the dechlorination process. If a range of TOC is typically needed to support this process this should be noted in the report.
7. Page 5, last paragraph; last sentence: *“As discussed during the April 14, 2011 technical meeting, further sampling for MNA parameters is currently being considered to provide more information regarding changes in the plume over time.”* This Office has stated in meetings and in our written comments on previous documents submitted for this Site that to date insufficient groundwater data has been collected to allow for an objective evaluation of MNA for this site. This Office request that you change *“considered”* to *“proposed”* in the above sentence. In order to evaluate the changes in a plume over time, the Navy will need to collect quarterly groundwater sampling over an extended period of time to adequately characterize the groundwater at this site. This Office does not consider two to three rounds of groundwater sampling (in some cases the same quarter) over a three year period sufficient to make any conclusions regarding changes to a plume over time.
8. Page 5, last paragraph: The analysis has primarily focused on chlorinated solvents at the site. At this site there are other contaminants (both organics and inorganic). The report should note whether these contaminants are also naturally attenuating.
9. If the Navy is going to propose MNA as an alternative for the groundwater in the FS, it would seem prudent for the Navy to obtain the necessary data, including a microcosm study, before the FS is delivered to the two Agencies for review.
10. The submittal includes tables in PDF format with the sampling results for the individual wells and individual contaminants. In future reports, please submit this information in a useable, non PDF, Excel format.

If you have any questions in regards to this email please feel free to contact me.

Regards,

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From: Ropp, Jim [mailto:Jim.Ropp@tetrattech.com]
Sent: Wednesday, May 25, 2011 4:05 PM
To: maritza.montegross@navy.mil; Lombardo.Ginny@epamail.epa.gov; Gary Jablonski; Moore, Deborah J CIV NAVFAC MIDLANT, PWD Newport; steinberg@mabbett.com; Kenneth_Munney@fws.gov
Cc: Parker, Stephen
Subject: Newport NUSC (Site 08) March 2011 MNA sampling tech memo

All:
FYI – You should be receiving the tech memo tomorrow via FedEx.
Let me know if you do not receive it.
thanks

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