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LETTER REGARDING REGULATORY REVIEW AND COMMENT ON THE GROUNDWATER  
MONITORED NATURAL ATTENUATION WORK PLAN AT SITE 8 NETC NEWPORT RI  
5/1/2012  
RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

## Ropp, Jim

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**From:** Pamela Crump <pamela.crump@DEM.RI.GOV>  
**Sent:** Tuesday, May 01, 2012 11:21 AM  
**To:** Ropp, Jim; Ginny Lombardo; maritza.montegross@navy.mil  
**Cc:** deborah.j.moore@navy.mil; Ken Munney; steinberg@mabbett.com; kemp@mabbett.com  
**Subject:** RE: Newport Site 8 (NUSC) Groundwater MNA sampling work plan for 2012

**Categories:** Newport

Hi Jim,

RIDEM has reviewed the Groundwater MNA Sampling Work Plan (April 9, 2012) for NUSC (Site 08) and concurs with this plan for the next two sampling rounds including the modifications discussed between the EPA and the Navy (as shown in the emails below). Please note that DA-MW09A appears to be missing in the tables for this Site. Does this well no longer exist? Also, I would like to be able to oversee this sampling on at least one day if possible.

Thanks,

Pamela E. Crump, EIT  
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RIDEM Office of Waste Management  
235 Promenade St.  
Providence, RI 02908  
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**From:** Ropp, Jim [mailto:Jim.Ropp@tetrattech.com]  
**Sent:** Friday, April 20, 2012 10:42 AM  
**To:** Ginny Lombardo; Maritza Montegross (maritza.montegross@navy.mil)  
**Cc:** Deb Moore (deborah.j.moore@navy.mil); Ken Munney; Pamela Crump; Paul Steinberg (steinberg@mabbett.com); kemp@mabbett.com  
**Subject:** RE: Newport Site 8 (NUSC) Groundwater MNA sampling work plan for 2012

Schedule correction. NUWC just informed me that we can't be onsite the week of May 7. So sampling will start May 14.  
Jim

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**From:** Ropp, Jim  
**Sent:** Thursday, April 19, 2012 3:57 PM  
**To:** 'Ginny Lombardo'; Maritza Montegross (maritza.montegross@navy.mil)  
**Cc:** Deb Moore (deborah.j.moore@navy.mil); Ken Munney; Pamela Crump; Paul Steinberg (steinberg@mabbett.com); Parker, Stephen; kemp@mabbett.com  
**Subject:** RE: Newport Site 8 (NUSC) Groundwater MNA sampling work plan for 2012

Hi Ginny

I spoke with Maritza and we're ok with adding those extra wells.

As you mentioned, that would more than we had planned for, so if we can drop low-priority wells, then I agree that MW08B, MW12, and MW108B can be left out. I'll plan to keep MW125B and MW110B this time because the metals data would be helpful.

Schedule-wise, we're planning to mobilize to the site to set up on May 3-4. Then we'll be collecting samples beginning May 7 and finishing around May 16.

Thanks

Jim

**From:** Ginny Lombardo [<mailto:Lombardo.Ginny@epamail.epa.gov>]

**Sent:** Wednesday, April 18, 2012 9:36 AM

**To:** Maritza Montegross ([maritza.montegross@navy.mil](mailto:maritza.montegross@navy.mil)); Ropp, Jim

**Cc:** Deb Moore ([deborah.j.moore@navy.mil](mailto:deborah.j.moore@navy.mil)); Wagner, Glenn; Ken Munney; Pamela Crump; Paul Steinberg ([steinberg@mabbett.com](mailto:steinberg@mabbett.com)); Parker, Stephen; [kemp@mabbett.com](mailto:kemp@mabbett.com)

**Subject:** Re: Newport Site 8 (NUSC) Groundwater MNA sampling work plan for 2012

Maritza/Jim-

EPA comments on the MNA WP:

EPA requests that the Navy consider adding the following wells to the proposed sampling program: 09B, 100B, 102B, 105B, 124B, 117B-D2, and 118B-D2. The principal purpose of this supplemental sampling is to investigate concentration changes of COCs in groundwater to better assess the presence of MNA and the rate of biodegradation and/or abiotic concentration changes. EPA recommends these additional wells, as these wells are within the plumes and would offer additional valuable information on the biodegradation rate in critical areas of the plume. EPA recognizes that these wells were not included in the 2011 MNA round (Round 1); however, EPA believes that other historical data from the RI and/or SRI, along with the 2012 rounds, will offer valuable information on the efficacy of MNA as an element of the remedy for NUSC. EPA's rationale for each of the recommended wells is provided below:

- 09B: 1,1-DCE and 1,1-DCA each had two prior detections at greater than their PRG and 09B is located between upgradient and downgradient wells with even greater 1,1-DCE and 1,1-DCA concentrations than 09B.
- 100B: 1,1-DCA concentration at greater than 100 times the PRG.
- 102B: increasing concentrations of TCE based on two previous sampling events and is apparently located along the TCE plume flow path (it also had elevated manganese).
- 105B: to evaluate the downgradient extent of 1,1-DCA and 1,1-DCE now compared to prior detections in 2008 and 2010.
- 124B: to evaluate changes to deep 1,1-DCA and TCE concentrations compared to 2008.
- 117B-D2: screened in the interval between the 127B and 117B-D1 screened intervals, both of which had TCE greater than the MCL.
- 118B-D2: screened in the same interval as 127B and 128B, both of which had TCE greater than the MCL.

EPA would be willing to consider eliminating wells that seem to be lower priority wells, if Navy cannot accommodate the additional well recommendations. Wells that Navy included in their proposal that EPA considers to be lower priority wells are: 08B, 12, 108B, 110B, and 125B. There have been no prior detections or insignificant detections at 08B, 12, 110B, and 125B; and 108B is an isolated well with prior TCE detections below or only slightly above the MCL.

We recognize that the Navy is planning to conduct sampling the week of April 30th. I am available until 2pm today and then out of the office for the rest of the week. If you would like to discuss further, we could schedule a conference call for today before 2pm or sometime next week, so that we can resolve these issues prior to the 30th. Thanks.

Ginny Lombardo  
Remedial Project Manager

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From: "Ropp, Jim" <[Jim.Ropp@tetrattech.com](mailto:Jim.Ropp@tetrattech.com)>  
To: Ginny Lombardo/R1/USEPA/US@EPA, Pamela Crump <[pamela.crump@DEM.RI.GOV](mailto:pamela.crump@DEM.RI.GOV)>  
Cc: "Maritza Montegross ([maritza.montegross@navy.mil](mailto:maritza.montegross@navy.mil))" <[maritza.montegross@navy.mil](mailto:maritza.montegross@navy.mil)>, "Deb Moore ([deborah.j.moore@navy.mil](mailto:deborah.j.moore@navy.mil))" <[deborah.j.moore@navy.mil](mailto:deborah.j.moore@navy.mil)>, "Paul Steinberg ([steinberg@mabbett.com](mailto:steinberg@mabbett.com))" <[steinberg@mabbett.com](mailto:steinberg@mabbett.com)>, Ken Munney <[Kenneth\\_Munney@fws.gov](mailto:Kenneth_Munney@fws.gov)>, "Parker, Stephen" <[Stephen.Parker@tetrattech.com](mailto:Stephen.Parker@tetrattech.com)>, "Wagner, Glenn" <[Glenn.Wagner@tetrattech.com](mailto:Glenn.Wagner@tetrattech.com)>  
Date: 04/09/2012 03:22 PM  
Subject: Newport Site 8 (NUSC) Groundwater MNA sampling work plan for 2012

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Hi Ginny and Pam

Attached, please find the MNA sampling work plan for NUSC. (Hardcopy is being sent via U.S. mail.)

Field work could begin as early as April 30, so let me know no later than April 20 if you have any questions/concerns.

This work plan matches what was approved last time (March 2011), but with the addition of TAL metals analyses and MW-103S.  
thanks

**Jim Ropp, P.E.** | Project Manager

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[attachment "120409 Letter - NUSC MNA Work Plan for 2012.pdf" deleted by Ginny Lombardo/R1/USEPA/US]