

N62661.AR.002747  
NS NEWPORT  
5090.3a

LETTER AND U S EPA REGION I COMMENTS ON DRAFT TECHNICAL MEMORANDUM  
MAY 2012 MONITORED NATURAL ATTENUATION GROUNDWATER SAMPLING RESULTS  
SITE 8 NAVAL UNDERSEA SYSTEMS CENTER (NUSC) DISPOSAL AREA NS NEWPORT RI  
9/13/2012  
U S EPA REGION I



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 1  
5 POST OFFICE SQUARE, SUITE 100  
BOSTON, MASSACHUSETTS 02109-3912

September 13, 2012

Maritza L. Montegross  
Remedial Project Manager  
NAVFAC MIDLANT, Code OPNEEV  
9742 Maryland Avenue, Bldg. Z-144  
Norfolk, VA 23511-3095

Re: Draft Technical Memorandum  
May 2012 Monitored Natural Attenuation (MNA) Groundwater Sampling Results  
Site 08 – Naval Undersea Systems Center (NUSC) Disposal Area  
NAVSTA Newport, Rhode Island  
August 2012

Dear Ms. Montegross:

EPA has reviewed the Draft Monitored Natural Attenuation (MNA) Technical Memorandum for Site 8, NUSC Disposal Area at Naval Station Newport, Newport, Rhode Island, dated August 2012 (MNA Tech Memo). The MNA Tech Memo presents the results of the latest groundwater sampling event conducted in May 2012. This information was collected to add to the groundwater sample database to help evaluate the natural attenuation of chlorinated volatile organic compounds in groundwater at Site 8 and will be used together with existing and yet to be collected data as the remedial design is developed.

The document was reviewed for completeness, technical accuracy, and consistency. In addition, the activities completed during the subject sampling event were compared to the requirements of the work plan. EPA's comments on the MNA Tech Memo attached.

If you have any questions, please contact me at (617) 918-1754 or at [lombardo.ginny@epa.gov](mailto:lombardo.ginny@epa.gov).

Sincerely,

A handwritten signature in blue ink that reads "Ginny Lombardo".

Ginny Lombardo  
Remedial Project Manager

cc: Pamela Crump, RI DEM  
Deb Moore, NAVSTA Newport  
James Ropp, TtNUS  
Stephen Parker, TtNUS  
Ken Munney, USF&W  
Greg Kemp, Mabbett & Associates, Inc.

**EPA Comments on  
Draft MNA Technical Memorandum  
Presenting May 2012 Sampling Results  
Site 08, NUSC Disposal Area  
Naval Station Newport, Newport, Rhode Island  
August 2012**

**GENERAL COMMENTS**

1. When is the Round 3 sampling event planned?
2. Based on the releases that have occurred at the NUSC Disposal Area, 1,4-dioxane needs to be included on the list of analytes. Please include it in all future sampling events.
3. At some point prior to or in conjunction with completion of the remedial design, EPA expects that Navy will provide a comprehensive MNA Tech Memo incorporating an evaluation of all available monitoring data including a trend analysis and a recalculation of the Biochlor modeling to provide up-to-date baseline and insight into the progress of MNA at the NUSC Disposal Area.

**SPECIFIC COMMENTS**

1. Page 1, §1.0: EPA expects that Navy will continue to conduct additional MNA sampling events between now and the initiation of the remedial action to establish an adequate baseline database.
2. Page 5, §3.1: The second bullet indicates that MW-07B has been altered; therefore, Navy should plan to re-survey this well to account for the change in the well height before collecting groundwater elevation data. To complete the documentation, a revised monitoring well construction log should be prepared and submitted for the record.
3. Page 11, §3.2.4: Please correct the last sentence in the partial paragraph at the top of the page: one of the ethane references should refer to ethene.
4. Figures 1 and 2: Reporting total chlorinated VOCs does not provide much insight into the biodegradation occurring in groundwater. To make the figures more useful, please provide figures for the individual chlorinated VOCs.
5. Table 1: Several of the listed historical maximum concentrations are not correct and underreport the maximum historical concentrations. Please review and correct.
6. Table 3:
  - Please add the screened intervals to this table.
  - Some of the classifications of reducing conditions labeled as *intermediate* appear questionable and not apparently consistent throughout this table. Please define for this table what a low DO means.

- Rather than simply trying to classify the reducing conditions at the monitoring wells, Navy needs to screen the wells in accordance with EPA's *Weighting for Preliminary Screening for Anaerobic Biodegradation Processes* (refer to Table 2.3 in Chapter 2 of the referenced document). This screening evaluates multiple lines of evidence for anaerobic biodegradation rather than just reducing conditions. The results of the screening should be included as a table in the subject report. For example, for MW-103B, MW-104B, and MW124B, EPA calculated screening values of 18, 7, and 17, respectively, indicating adequate evidence for anaerobic biodegradation at all three wells; whereas Table 3 classifies MW-124B as intermediate based only on DO and ORP.
  - For both the Depth Sampled and the Water Depth columns in this table please edit the column titles to clarify that the depths reported are measured from the top of the casing in both instances. (Note that the field forms standard language use depth relative to ground surface so technically the depths are not consistent as reported.)
7. **Table 5:** The last column contains erroneous information for trichloroethene in that it reflects the number of samples exceeding PRGs, not the number of wells, because duplicate sample results have been included. Please review the table for other duplications and correct the table as appropriate.
8. **Table 6:** For the record, some of the relatively insignificant changes in concentrations in this table do not warrant classification as lower or higher. EPA does not concur with many of the classifications proposed in this table, because they do not reflect statistically significant trends. Also, as noted elsewhere, evaluating total chlorinated VOCs provides less useful information than evaluating individual chlorinated VOCs.