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LETTER AND U S EPA REGION I COMMENTS ON REVISED DRAFT FINAL SAMPLING AND
ANALYSIS PLAN FOR DATA GAPS ASSESSMENT TANK FARM 2 CATEGORY 1 AREAS NS
NEWPORT RI
12/10/2012
U S EPA REGION I

EPA 12101C



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION I

5 Post Office Square, Suite 100
Boston, MA 02109-3912

December 10, 2012

Mr. Roberto Pagtalunan
NAVFAC MIDLANT (Code OPNEEV)
Environmental Restoration
Building Z-144, Room 109
9742 Maryland Avenue
Norfolk, VA 23511-3095

Re: Revised Draft Final Sampling and Analysis Plan for the Data Gaps Assessment for Tank Farm 2, Category 1 Areas

Dear Mr. Pagtalunan:

Thank you for the opportunity to review the *Revised Draft Final Sampling and Analysis Plan for Tank Farm 2 Category 1 Areas* dated November 2012 (SAP). The SAP presents the sampling design and rationale and the analytical and data assessment requirements for the project in accordance with the requirements of the *Uniform Federal Policy for Quality Assurance Plans* and *EPA Guidance for Quality Assurance Project Plans*. Detailed comments are provided in Attachment A.

The Navy has relied on currently-available groundwater data to conclude that no groundwater sampling is required for the data gaps investigation. There are several concerns related to the adequacy of the available groundwater data for the Category 1 AOCs.

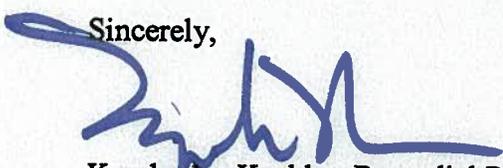
- a) Groundwater is generally within bedrock and therefore the actual direction of groundwater flow through the fractured bedrock is uncertain.
- b) The water level monitoring data provided in Figure 2 is erratic, documenting the unreliable groundwater flow direction in bedrock.
- c) The information that has been provided in Figures 2 and 3 suggests that no groundwater monitoring wells have been installed proximate to the Category 1 AOCs and release areas and none of the tank monitoring wells are clearly located at or downgradient of AOCs 001, 003, 004, or 005; Building 219; or the buoy storage area potentially resulting in a significant groundwater data gap.

Consequently, EPA does not concur that available groundwater data indicate that there are no impacts to groundwater from the Category 1 Areas. If soil contamination is found, further investigation of the groundwater associated with the Category 1 areas is expected to be necessary before a conclusion of no groundwater impacts can be confirmed.

The appendices that need to be updated were not provided.

I look forward to working with you and the Rhode Island Department of Environmental Management toward the cleanup of the Derecktor Shipyard Gould Island. Please do not hesitate to contact me at (617) 918-1385 should you have any questions or wish to arrange a meeting.

Sincerely,



Kimberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: Pamela Crump, RIDEM, Providence, RI
Darlene Ward, NETC, Newport, RI
Steven Parker, Tetra Tech-NUS, Wilmington, MA

ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. 40, §11.2.1	The first bullet states that " <i>Category 1 data are not needed from groundwater because previous groundwater sampling downgradient of the Category 1 areas did not indicate contamination.</i> " EPA reviewed revised Figure 2, which now contains groundwater contours, together with Figure 3, which shows the locations of the AOCs, and there are no apparent groundwater monitoring wells reliably downgradient of AOCs 001 and 003 and only one groundwater monitoring well potentially downgradient of AOCs 004 and 005. Consequently, it appears that an appropriate investigation of the groundwater related to these four AOCs has not been completed and cannot be completed using the existing groundwater monitoring wells. The SAP text further states " <i>The project team will assess the need for groundwater data following receipt of the analytical results from the soil sampling.</i> " Without viable groundwater data, EPA will evaluate the soil data in light of the RSLs for protection of groundwater and may require follow-up groundwater sampling.
p. 41, §11.2.2	The project screening levels identified in the first bullet should reference EPA's Regional Screening Levels. Please include them for human health risk screening.
p. 42, §11.2.2	Regarding the discussion in the second full paragraph, because of the absence of viable groundwater monitoring data for the Category 1 Areas, EPA will evaluate soil data in light of the protection of groundwater RSLs. This review may identify data gaps that will need to be resolved.
p. 43, §11.3	<p>a) The first sentence in the last paragraph has been edited to state that no groundwater impacts have been detected downgradient of the PCB and lead based paint releases. No groundwater monitoring wells have been installed downgradient of these areas to monitor for releases from them. Please revise.</p> <p>b) The last sentence states that "<i>However, the screening of soil data against protection of groundwater SSLs is of interest to allow a qualitative evaluation of the potential for chemical migration from soil to groundwater, in the unlikely event that contaminants migrated through the bedrock.</i>" EPA concurs that screening of soil data against protection of groundwater criteria should be performed, especially considering the proposed elimination of groundwater sampling from the scope of the SAP. However, the Navy has eliminated the protection of groundwater SSLs from Worksheet 15.</p>

- p. 44, §11.4.1 The first sentence in the second paragraph appears to contradict the discussion throughout this SAP. Please rewrite the second paragraph to clarify. It appears that the intent is only to indicate that there is a difference for dioxins in that the total TEQ will be evaluated rather than screening individual congeners. This confusion is highlighted in the first sentence in the third paragraph where *PSLs* has been deleted and replaced with *screening levels*.
- p. 45, §11.4.2 EPA does not accept the geochemical method *in lieu of* a site-specific background study. Please delete the last sentence in the second paragraph.
- p. 56, WS15 Protection of groundwater soil screening levels have erroneously been deleted from this table making it inconsistent with the SAP text. Please include them.
- p. 71, WS18
- a) This worksheet shows that 98 total samples will be collected at AOC-004/005 for PAHs, metals, and dioxins but none from the 8-10 foot depth, whereas WS17 indicates that 49 samples will be collected at the 8-10 foot depth for both PAHs and metals. Please correct the inconsistency and add a footnote qualification consistent with the text indicating that deep samples may need to be collected at shallower depths if appropriate because of shallow bedrock.
 - b) This worksheet also shows that eight samples will be collected at Building 219 at 0-6-inch depth in addition to eight samples each at 0-1 foot and 2-4 foot depths, totaling 24 samples. However, WS17 shows only 16 samples at Building 219 with no samples collected at 0-6-inch depth. Please correct.
- p. 78, WS20 Please correct this table after resolving the discrepancies between WS17 and WS18.