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LETTER AND COMMENTS FROM U S EPA REGION I ON STUDY AREA SCREENING  
EVALUATION TANK FARM 3 NS NEWPORT RI  
10/26/2012  
U S EPA REGION I

EPA 10 26 12



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION I**

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

October 26, 2012

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

Re: Study Area Screening Evaluation for Tank Farm 3

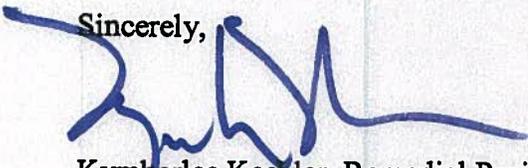
Dear Mr. Pagtalunan:

EPA reviewed the Study Area Screening Evaluation (SASE) for Tank Farm 3 dated October 2012. The SASE documents the investigations that were conducted to determine if contaminants are present at concentrations that require further investigations to characterize site risks. Any data gaps identified will be addressed in subsequent investigations. Detailed comments are provided in Attachment A.

In previous versions of the SASE, the Navy only used EPA Regional Screening Levels (RSLs) for Industrial Soil because it assumed that the Site would have Land Use Controls to prevent residential use. Since the Navy now intends to identify areas where residential risk criteria are exceeded, it must consider both EPA's residential RSLs and RIDEM's residential direct exposure criteria (DECs). Consequently, unless Navy still intends to impose land use controls preventing residential use over the entirety of the Category 1 areas, residential RSLs need to be included as screening criteria so the limits of the land use controls can be properly identified. Please clarify the intent and revise the SASE as appropriate.

I look forward to working with you and the Rhode Island Department of Environmental Management toward the cleanup of the Derecock 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

Deb Moore, NETC, Newport, RI  
Steven Parker, Tetra Tech-NUS, Wilmington, MA

## ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. 4-3, §4.2.1	Add residential RSLs as screening criteria.
p. 4-4, §4.2.1	In the last bullet, the phrase following (RIDEM, 2011) needs to be deleted.
p. 4-4, §4.3	The discussion in this section is inconsistent. The second full paragraph on page 4-5 discusses the establishment of LUCs for certain portions of the additional seven Category 2 areas. No such discussion is provided for the Category 1 areas or the four Category 2 areas that exceed industrial DEC's. It is not clear if the Navy intends to impose LUCs over the full extent of these three Category 1 and four Category 2 areas and if so, whether that is consistent with the proposed action for the seven additional Category 2 areas. In order to identify areas where residential risk criteria are exceeded, residential risk screening criteria need to be evaluated.
p. 4-5, §4.3	In the first full paragraph, please change the second sentence to: "... management of <u>virgin</u> petroleum products, ...."
p. 4-6, §4.3.1	<p>a) In the first paragraph, the first sentence refers to waste and the second sentence refers to waste fuel. Please revise this language. Waste petroleum is not exempt from CERCLA. If waste petroleum was stored at Tank Farm 3, please identify those storage areas.</p> <p>b) Please edit the last sentence in the first paragraph to clarify the information presented for AOC 001: "Although this is the case, investigations conducted at this location to date have only analyzed the samples collected for GRO and DRO. The results of these investigations are summarized below."</p> <p>c) In the second sentence of the second paragraph, please clarify which screening criteria are referenced. If only industrial criteria were considered, the Navy needs to assess the data versus residential criteria.</p>
p. 4-7, §4.3.1	In the first sentence of the first paragraph, please clarify which criteria are referenced. If only industrial criteria were considered, the Navy needs to reassess the data versus residential criteria.
p. 4-7, §4.3.2	For each Category 2 area discussed, please edit the text as necessary to acknowledge any exceedances of the residential DEC's within each area or confirm that residential DEC's were not exceeded.
p. 5-8, §5.2.1	As commented earlier, since the reporting limit for benzo(a)pyrene for the groundwater samples collected at Tank Farm 3 significantly exceeds the MCL and the reporting limit for benzo(a)pyrene in soil samples significantly exceeded the soil screening concentrations, no groundwater data that demonstrates that site groundwater has not been impacted by PAH contamination has been collected.

Additional groundwater data with appropriate detection limits are required.

- p. 5-9, §5.2.2 As commented earlier, since the reporting limit for PCBs for the groundwater samples collected at Tank Farm 3 significantly exceeds the MCL and the reporting limit for PCBs in soil samples significantly exceeded the soil screening concentrations, no groundwater data that demonstrates that site groundwater has not been impacted has been collected. Additional groundwater data with appropriate detection limits are required.
- p. 5-11, §5.4 Please include the rationale provided in the response regarding why chlorinated solvents are not a site contaminant.
- p. 6-1, §6.1.1 Please clearly state whether the entire perimeter of the site is fenced, thus restricting access.
- p. 6-2, §6.1.3 a) Delete the first paragraph.  
b) Edit the second sentence in the second paragraph in two places to refer to Category 1 areas rather than the Site and Tank Farm 3.
- p. 6-10, §6.3.3 Please clarify how the Navy will evaluate the Category 3 areas to determine if additional investigation will be performed. It appears that some level of field investigation and media sampling will be required to evaluate site risks.
- Table 2-1 No LUCs are proposed for AOC-001, AOC-020, or Building 227 post-SASE suggesting that the Navy plans to remediate these Category 1 areas to achieve an acceptable residential risk range. If this is not Navy's intent, please clarify.