

N62661.AR.002776  
NS NEWPORT  
5090.3a

LETTER AND U S EPA REGION I RESPONSE TO U S NAVY RESPONSE TO COMMENTS  
ON DRAFT FINAL FEASIBILITY STUDY FOR DECISION UNIT 4-1 SITES 12 TANK FARM 4  
NS NEWPORT RI  
1/4/2013  
U S EPA REGION I



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

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

January 4, 2013

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

Re: Responses to EPA's Comments on the Draft Final Feasibility Study for Decision Unit 4-1 at Site 12, Tank Farm 4

Dear Mr. Pagtalunan:

Thank you for the opportunity to review the responses, dated November 30, 2012, to EPA's comments, dated September 24, 2012, on the Draft Final Feasibility Study for Decision Unit 4-1 at Site 12, Tank Farm 4 dated August 2012 (FS). The FS presents the development and evaluation of remedial alternatives to mitigate unacceptable human risk associated with chemicals of concern in soil and groundwater at Decision Unit 4-1 at Site 12, Tank Farm 4. Detailed comments are provided in Attachment A. A number of the Navy's responses state that the response will be addressed in the text of the Final FS, so EPA will review the final text to assess whether its comments were adequately addressed.

As a general comment concerning the groundwater alternatives, the Navy proposes to monitor groundwater as part of remedial design to collect enough data to assess whether MNA would be effective in achieving groundwater standards. If the data do not support the finding, the Navy would propose an active treatment alternative. To avoid an interim groundwater remedy, the Navy should include a qualitative assessment of how long it estimates MNA might take based on the level of contaminants in the groundwater (such as "based on the low levels of groundwater contaminants present exceeding cleanup standards it is expected the MNA would be effective within twenty years") and then set a time period for how long the Navy will assess MNA's effectiveness before it switches to an active treatment remedy. Otherwise, the ROD would only be presenting an interim, versus a final, groundwater remedy.

I look forward to working with you and the Rhode Island Department of Environmental Management toward the cleanup of Tank Farm 4. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kimberlee Keckler".

Kimberlee Keckler, Remedial Project Manager  
Federal Facilities Superfund Section

Attachment

cc: Pamela Crump, RIDEM, Providence, RI  
Deb Moore, NETC, Newport, RI  
David Peterson, USEPA, Boston, MA  
Chau Vu, USEPA, Boston, MA  
Steven Parker, Tetra Tech-NUS, Wilmington, MA

## ATTACHMENT A

<u>Page</u>	<u>Comment</u>
SC3 (p. 1-3, ¶ 3)	Please clarify whether the dioxin standards cited in the response are equivalent to the revised standards that EPA stated in its comment.
SC10 (p. 2-5)	In the ROD, the RAO should be to achieve groundwater "RGs" rather than "PRGs."
SC11 (p. 2-17, §2.4.1)	<p>The response suggests that additional text will be inserted following the revised fourth sentence. Is the intent to present areas and volumes of subsurface soil exceeding the PRGs in addition to those areas and volumes discussed in the initial portion of Section 2.4.1?</p> <p>Also, please correct the first sentence in Section 2.4.1 to reference Figures 2-1 through 2-14.</p>
SC14 (p. 3-16, §3.4)	The context of the response should be restated. GW3 should be added as an independent alternative and the description of the monitored natural attenuation (MNA) alternative should state that if the MNA alternative is selected but fails to perform as expected, GW3 or a similar alternative would be implemented as a contingency remedy. Please revise the FS accordingly.
SC21 (p. 4-3, §4.1.3)	For the CERCLA remedy, the Navy only can cleanup to approved background levels. If the Navy has agreed to cleanup to a more stringent level to meet State regulatory issues that is satisfactory and can be noted in the text, but the RG in the ROD should not be any less than background.
SC22 (p. 4-3, §4.1.3)	Please correct the response to reference SB924, not SB934.
SC30 (p. 5-1, §5.0)	The Navy does not currently have sufficient data to evaluate the effectiveness of MNA or to estimate a timeframe for achievement of the remedial goals. Consequently, EPA's guidance for selection of MNA for DU 4-1 cannot be satisfied before remedy selection unless a decision is postponed to allow sufficient time to further characterize the site. This delay is likely to be extensive as several monitoring rounds would be required. EPA recommends selection of MNA with further evaluation post-ROD during a pre-design investigation and subsequent long-term monitoring events as proposed. If possible, please make any qualitative estimation (based on the low levels of groundwater contaminants present) of how long MNA may take for the FS and ROD (such as "expected to take at least twenty years.")
SC35 (p 5-6, ¶ 9)	The Groundwater RAO should be the text suggested for SC10 with the modification included in EPA's comment.
SC36 (p. 5-7, §5.3)	Please refer to the comment on SC30.
SC38 (Table 2-4)	The second sentence in the second paragraph of the response should refer to "... <u>no target area excavation in Alternative SO3 for manganese.</u> "
SC42 (Table 3-2)	To clarify, please revise the screening comment for <i>in situ</i> biological treatment to read "Eliminate: effective for organics but not effective for inorganics."

SC54 (p. 15, Table 5-5) If there is no State remediation standard that is more stringent than the federal standards, remove the remediation regulations from the table. The State regulations either are "Applicable" because they are more stringent or they are not ARARs.

*Additional Comments:*

p. 5-7, §5.3

Please revise the third paragraph to focus on exposure to groundwater during the time that contaminants of concern (COCs) remain above PRGs. Presumably, if GW2 will result in the restoration of the aquifer, so will GW1, although that is not clear from the text as currently written.

Figure 4-1

Please change the title of this figure to *Soil Excavation Areas for DU 4-1* because additional remedial action is required to prevent exposure to contamination left in place via land use controls. A separate figure should be developed to depict the proposed land use control boundaries for industrial and residential use.