

N62661.AR.002779
NS NEWPORT
5090.3a

LETTER AND U S EPA REGION I RESPONSES TO U S NAVY RESPONSES TO COMMENTS
ON REVISED DRAFT FINAL SAMPLING AND ANALYSIS PLAN DATA GAPS ASSESSMENT
TANK FARM 2 CATEGORY 1 AREAS NS NEWPORT RI
2/20/2013
U S EPA REGION I



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION I

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

February 20, 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 Revised Draft Final Sampling and Analysis Plan
Data Gaps Assessment for Tank Farm 2, Category 1 Areas

Dear Mr. Pagtalunan:

EPA reviewed the February 13, 2013 responses to our December 10, 2012 comments on 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.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Kymberlee Keckler".

Kymberlee 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. 40, §11.2.1	For the reasons cited in General Comment 1, EPA does not agree that “ <i>Category 1 data are not needed for groundwater because previous groundwater sampling downgradient of the Category 1 areas did not indicate contamination.</i> ” However, EPA would agree that “ <i>Category 1 data are not needed for groundwater at this time. The project team will assess the need for groundwater data after the analytical results from the soil sampling are received.</i> ” Please revise the SAP text here and elsewhere to reflect this change.
p. 44, §11.4.1	The contradiction still exists. Please refer to the discussion in the first bullet on page 41, Section 11.2.2, that confirms the contradiction that EPA referenced. The bullet states that “ <i>The PSLs are the lowest of the applicable human health risk-screening criteria, the RIDEM RDEC, the RIDEM leachability criteria, and the selected ecological soil screening levels (SSLs).</i> ” This is exactly the same language used in the referenced paragraph to describe soil screening levels (less the RIDEM references). Therefore, there is no apparent difference between PSLs and soil screening levels based on the language used. Any differences need to be clarified. Please also clarify the intent regarding dioxins and furans.

Additional Comments on SAP Revisions Provided with the Responses to Comments:

Worksheet 18	Please revise footnote 4 to read: “These samples will be collected at the indicated depth or at the top of bedrock whichever is shallower. However, if bedrock is encountered at less than six feet below grade these samples will be collected at the driller’s discretion.”
App. A, Table A-3.1	EPA’s original comment requested correction of the information presented regarding well GZ-226. Although the Navy’s original response stated that the correction has been made, Table A-3.1 contains no changes and Table A-2 was not provided to confirm what changes were made. Please provide Table A-2, indicate what change was made, and confirm that no change was required for Table A-3.1.