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LETTER AND THE U S EPA REGION I COMMENTS ON THE DRAFT SAMPLING AND
ANALYSIS PLAN MODIFICATION FOR DECISION UNIT 4-1 AT TANK FARM 4 SITE 12
OPERABLE UNIT 11 (OU 11) NS NEWPORT RI
06/30/2014
U S EPA REGION I BOSTON MA



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION I

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

June 30, 2014

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

Re: Draft Sampling and Analysis Plan Modification for Decision Unit 4-1 at Tank Farm 4 (Site 12),
Operable Unit 11

Dear Mr. Pagtalunan:

Thank you for the opportunity to review the *Draft Sampling and Analysis Plan Modification for Decision Unit 4-1 at Site 12, Operable Unit 11 at Tank Farm 4*, dated June 26, 2014 (SAP Mod). The SAP Mod presents the sampling and analysis requirements to investigate potential soil contamination related to the presence of multiple pails or drums identified during a recent site walk associated with the pre-design investigation (PDI) for the site. Detailed comments are provided in Attachment A.

If the same decision criteria specified in the original Sampling and Analysis Plan (SAP) for Petroflag screening will be used to identify samples for laboratory analysis, please state this in the SAP Mod. Petroflag screening should not be used to eliminate laboratory analyses for metals, pesticides, and PCBs.

Because the analytical suite for this investigation is more comprehensive than that for the original PDI sampling event, this modification needs to include pertinent information related to the additional analytical parameters such as analytical methods, project action limits, sample holding times, preservation requirements, and container/sample volume requirements. Please add one (or two) tables/worksheets presenting this information.

The information included in this SAP Mod is not sufficient to contract with the analytical laboratory to conduct the analyses. The standard worksheets that identify the analytical requirements for the laboratory need to be developed and included in this SAP Mod for the analytes and methods that were not included in the original SAP. At a minimum this should include Worksheets 23 and 28.

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

Sincerely,

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. 2, ¶1	The second bullet should refer to surface soil sampling because the original SAP referred to soil from 0-2 feet below ground surface as surface soil.
p. 2, ¶4	Soil borings should be at the location of each pail/drum and if appropriate at suspect locations between pails/drums. Sample locations should not be distributed across each area to characterize the area.
p. 3	For completeness, please also list cooler temperature blanks.