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LETTER AND COMMENTS FROM RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL  
MANAGEMENT REGARDING WORK PLAN FOR SUPPLEMENTAL MONITORED NATURAL  
ATTENUATION SAMPLING AT SITE 8 NAVAL UNDERSEA SYSTEMS COMMAND NS  
NEWPORT RI  
03/10/2011  
RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT



RHODE ISLAND

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

10 March 2011

Maritza Montegross  
NAVFAC MIDLANT (Code OPTE3)  
Environmental Restoration  
Building Z 144, Room 109  
9742 Maryland Avenue  
Norfolk, VA 23511-3095

Re: Work Plan for Supplemental Monitored Natural Attenuation Sampling  
Site 08, NUSC Disposal Area  
Naval Station Newport, Newport, Rhode Island

Dear Ms. Montegross,

The Office of Waste Management at the Rhode Island Department of Environmental Management has conducted a review of the "*Work Plan for Supplemental Monitored Natural Attenuation Sampling*", dated 2 March 2011 for Naval Undersea Systems Center Disposal Area (NUSC Site 08), Naval Station Newport, located in Newport, Rhode Island. As a result of this review, this Office has generated the attached comments on the "*Work Plan for Supplemental Monitored Natural Attenuation Sampling*".

If you have any questions, in regards to this letter, please contact me at (401) 222-2797, extension 7148 or by e-mail at [gary.jablonski@dem.ri.gov](mailto:gary.jablonski@dem.ri.gov).

Sincerely,

Gary Jablonski, Principal Engineer  
Office of Waste Management

cc: Matthew DeStefano, RIDEM  
Richard Gottlieb, RIDEM  
Ginny Lombardo, USEPA Region I  
Deb Moore, NETC, Newport, RI  
Stephen Parker, Tetra Tech

**Work Plan for Supplemental Monitored Natural Attenuation Sampling**  
**Site 8- Naval Undersea Systems Center Disposal Area**  
**Naval Station Newport, Newport, Rhode Island**  
**Dated 2 March 2011**

**1. General Comment.**

After reviewing the Work Plan, it appears in most cases the Team will only have two rounds of groundwater data from each groundwater well for inclusion into the Site data base to make a decision in regards to MNA for the Site. It appears to this reviewer that two rounds of groundwater data are inadequate to allow an objective evaluation of MNA for this Site. It would seem prudent to continue this sampling program, as described in this Work Plan, for two additional quarterly rounds (June and September) in order to get a more robust sampling set of groundwater data to move forward with this Site through to the final decision process.

**2. Page 2, Sampling Plan; Table 3 and Figure 1.**

Monitoring well DA-MW128B has the 2<sup>nd</sup> highest hit of TCE on the entire site. RIDEM has previously commented that there might be a potential source of chlorinated solvents in this North Meadow Area. Please add this well and a down gradient well (DA-MW127B or DA-MW119B) to the list of wells to be analyzed for the MNA parameters.

**3. Pages 2 &3, Sampling Plan; Whole Section.**

It appears to this reviewer, that there is a lack of MNA data collected or proposed to be collected in the Building 179 Area. The Building 179 Area has groundwater data that is above MCLs for PCE, TCE, and Vinyl Chloride. Please add to this section of the Work Plan a few of the wells located in this Building 179 Area (DA-MW07A, B, DA-MW129B, DA-MW09A, B, and DA-MW101B) to be analyzed for the MNA parameters.

**4. Pages 2 &3, Sampling Plan; Whole Section.**

In the "EPA Technical Protocol for Evaluating Natural Attenuation of Chlorinated Solvents in Groundwater" dated September 1998, Page 30, Step 1: Determining if Biodegradation is Occurring, 2<sup>nd</sup> sentence states: "*These areas should include... (4) upgradient and lateral locations that are not impacted by the plume.*" Please add a few lateral groundwater well locations (DA-MW13A, B, DA-MW08A, B or DA-MW11) to be sampled for MNA parameters to this Work Plan.

**5. Page 3, Sampling Plan; Well Sampling Bullet.**

The text in this bullet does not mention if pH, ORP, and DO will be analyzed during this round of sampling. Please add these three MNA parameters to the list of MNA parameters to be analyzed for in this section of the Work Plan