

Frye, Curtis A. CIV ENGFLDACT NORTHEAST EV23/CF

From: Frye, Curtis A. CIV ENGFLDACT NORTHEAST EV23/CF
Sent: Monday, October 25, 2004 11:11 AM
To: 'Keckler.Kymberlee@epamail.epa.gov'
Cc: pkulpa@dem.state.ri.us; jstump@gfnet.com; Mueller, Cornelia A CIV N8N, Env Off; parkers@ttnus.com; Barclift, David J CIV ENGFLDACT NORTHEAST; Yeutter, Lisa I CIV ENGFLDACT NORTHEAST; Bober, Todd A CIV ENGFLDACT NORTHEAST
Subject: OFFTA Sediment and GW Monitoring Work Plan

To all,

I would like to schedule a conference call to discuss. How is this Thursday AM, at 0930?

In the meantime, here are responses to the below EPA comments:

Comment, page 2-13, §2.4.5.3 EPA's comment questioned whether the use of such a small data set for the proposed sediment monitoring would meet the objectives of this project. The Navy has indicated that the data for prior rounds are limited and that there is no opportunity to overcome this limitation. The historical data set for sampling locations such as the storm drains is limited for comparing to the future monitoring data. However, for the site station data, the historical data set has many data points. Increasing the number of site stations from the proposed maximum number of 9 samples to a greater number such as 15 or 16 samples would allow smaller increases in contaminants to be detected when historical data and future monitoring data are compared.

Response: The purpose of this effort was to revisit the stations that had high risk or were found to exceed the ecological PRGs for the site, and sample those stations before and after the soil removal. The stations selected in Table 3-1 of the work plan are those where contaminants have been highest.

We responded to the comment that the data set (for these selected stations) was limited, and this could not be changed, meaning these are the only stations that exceeded the criteria, and there are only so many rounds of data available for those stations before soil removal (mound removal) began last month. Section 2.4.5 of the work plan describes the statistical evaluation of the data, and these comparisons are acceptable for the size of the data sets, although it is acknowledged that larger data sets would provide better analyses. Data trending and more rigorous statistical analyses will be done as a part of a long term monitoring program to be developed after the soil removals are completed.

Comment, page 2-14, §2.4.5.3 The Work Plan specifies eelgrass monitoring will include diver surveys. "Transects will be established and extent distances will be checked during each sampling event, and the extents will be remapped, and compared with those conducted previously to determine growth or reduction." It appears from the Navy response that the eelgrass diver surveys will occur in August 2005 and that the August 2005 data will be compared to the August 2002 data. As previously commented, EPA prefers a diver survey to map eelgrass immediately prior to soil removal activities and immediately after soil removal activities.

Response: We conducted inquiries on whether to do an eelgrass survey now. The experts agree that the best time to do an eelgrass survey is August, to see the maximum growth. So, our plan is to survey in August 2005. Eelgrass goes dormant in the fall, and sheds much of the leaf matter. If we did a baseline survey now, it would not be comparable to the one done in 2002 and would not be comparable to any others done in future summers. A consistent season for this effort is necessary if one wants to make the findings comparable. Doing all future survey work in the Oct-Nov time frame is probably not appropriate.

vr,
CF
Curt Frye, P.E.



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-----Original Message-----

From: Keckler.Kymberlee@epamail.epa.gov
[mailto:Keckler.Kymberlee@epamail.epa.gov]
Sent: Tuesday, October 12, 2004 10:04
To: Frye, Curtis A. CIV ENGFLDACT NORTHEAST EV23/CF
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N8N, Env Off; parkers@ttnus.com
Subject: OFFTA soil removal - responses

page 2-13, §2.4.5.3 EPA's comment questioned whether the use of such a small data set for the proposed sediment monitoring would meet the objectives of this project. The Navy has indicated that the data for prior rounds are limited and that there is no opportunity to overcome this limitation. Except for sampling locations such as the storm drains, the historical data set may contain only one or two samples to use for comparing to the future monitoring data. However, for the site station data, the historical data set has many data points. Increasing the number of site stations from the proposed maximum number of 9 samples to a greater number such as 15 or 16 samples would allow smaller increases in contaminants to be detected when historical data and future monitoring data are compared.

page 2-14, §2.4.5.3 The Work Plan specifies eelgrass monitoring will include diver surveys. "Transects will be established and extent distances will be checked during each sampling event, and the extents will be remapped, and compared with those conducted previously to determine growth or reduction." It appears from the Navy response that the eelgrass diver surveys will occur in August 2005 and that the August 2005 data will be compared to the August 2002 data. As previously commented, EPA prefers a diver survey to map eelgrass immediately prior to soil removal activities and immediately after soil removal activities.

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