



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203-0001

September 17, 1997

Mr. Philip Otis
Northern Division - NAVFAC
10 Industrial Highway
Code 1811/PO - Mail Stop 82
Lester, PA 19113-2090

Re: Offshore Sampling Activities at Site 09, former Naval Construction Battalion Center (NCBC), Davisville, Rhode Island

Dear Mr. Otis:

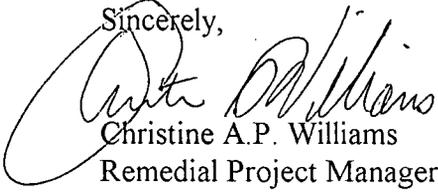
Pursuant to § 8.9 of the NCBC Federal Facility Agreement (FFA), the Environmental Protection Agency's (EPA) has observed the above referenced sampling activity. Please find our preliminary comments enclosed. The sampling activities have started prior to the finalization of the work plan, however, EPA has endeavored to be available on site to work with the Navy to alleviate our concerns with the possible loss of VOAs and the collection of all needed data during the sampling activity. Observation has shown that the Navy is actively trying to ensure that the groundwater collection tubing and sample containers remain free of bubbles, noting how difficult this is. The field notes indicating if the tubing contained bubbles should be incorporated into the report when issued.

The Navy's appropriate priorities at this time are to collect geotechnical information and then to collect analytical information about the geologic formations in order to facilitate a timely cap design. EPA has determined that the groundwater sampling to date has produced samples adequate for "screening" level data quality suitable for the development of an LTMP and that accurate baseline information via a different sampling methodology is needed for the implementation/evaluation of the LTMP. The sediment sampling to date seems to be adequate for characterization of the shallow zone of the nearshore sediments for sediment removal/covering decisions. However, EPA has found a deficiency in the sampling protocol for the deeper sediments. A data gap will result if the deeper sediments with associated significant PID hits are not sampled.

The knowledge of the locations of the preferential pathways is necessary in order to efficiently monitor the effectiveness of the remedy. The Navy has stated that the majority of EPA's concerns with respect to preferential flow paths will be addressed when the Navy develops the long-term monitoring plan (LTMP) for this site. EPA believes that installation of prepacked screens at the current WP depth/ locations and at the depths identified by any significant PID hits may save the Navy valuable design time, provide better data for the LTMP development and overall project.

The enclosed bullated thoughts more clearly articulate the message I have tried to convey in this letter. We continue to look forward to working with the Navy and RIDEM toward development of the long-term monitoring plan for this site. If you have any questions about this letter please call me at (617) 573-5736.

Sincerely,



Christine A.P. Williams
Remedial Project Manager
Federal Facilities Superfund Section

Enclosure

cc: Richard Gottlieb, RIDEM
Walter Davis, CSO
Tim Prior, USF&WS
Ken Finkelstein, NOAA
Steve DiMattei, EPA
Bill Brandon, EPA
Marilyn Cohen, ToNK
George Horvat, Dynamac
Jim Shultz, EA Science & Eng.

- Soil/sediment sampling procedure (for VOCs only): VOA jar should be pushed directly into soil/sediment column rather than cutting sediments with a spoon and packing into jars. The goal is to minimize loss of any of the low level VOCs that may be lost upon exposure to air.
- Given the low purge rates and the generally low quality of data (i.e., "screening data"), filtered samples are NOT absolutely necessary for VOC, SVOC & Salinity analyses. On the other hand, filtering would be necessary for metals analyses. A coarse filter, added in-line prior to the fine (.45 micron) filter, may be beneficial when filtering is required (e.g., for inorganic analyses).
- Turbidity could be a problem for the use of the flow through cell to collect water quality data. EPA strongly recommends that the use of the flow through cell be discontinued and the Navy utilize separate probes in a small container of groundwater to collect real-time ground water quality measurements after samples for VOC, Salinity, and Metals analysis have been taken.
- Duplicates have not yet been collected due to the discovery of the long time requirements involved for ground water recharge during sample collection at the borings observed so far. If the slow recharge continues, EPA would be more interested in obtaining a full suite of analytical data than QA samples. However, if the situation changes and recharge becomes significantly faster at any of the sample locations, QA samples required by the work plan should be taken.
- There is currently no provision for analytical sample collection at locations/depths where PID hits are identified in zones other than where "required" samples currently being collected. EPA considers this to be a data gap. All relevant information is very important to the overall site project. If significant PID hits are found EPA will require additional samples to be taken at these locations at a later date (i.e., following collection of the geotechnical samples), so as not to slow up the capping design process.
- The groundwater sampling to date has produced samples adequate for "screening" level data quality (a boring rather than a properly screened and developed well is being sampled). The data is therefore not suitable for any purpose other than for screening. As such this data would be considered useful in the development of an LTMP for the site, but not for the actual implementation/evaluation of the LTMP.
- Accurate baseline information via a different sampling methodology is needed for the evaluation of the LTMP. Screening data will be useful for siting additional monitoring wells in the discharge locations. A prepacked screen could be installed in the time the Navy is using to wait for recharge of the current slotted well point. These prepacked screens would provide the Navy with higher quality data. The wells could be purged and then sampled by boat at a later date, independently of the barge. Additional information will be provided as soon as we receive it.