



United States Environmental Protection Agency

One Congress Street, Suite 1100 (HBT)  
Boston, MA 02114-2023.

February 27, 2004

Mr. Fred Evans  
Naval Facilities Engineering Division - North East  
10 Industrial Highway, Code 1811/FE - Mail Stop 82  
Lester, PA 19113-2090

Re: Draft, Site 16 Supplemental Phase II Quality Assurance Project Plan Addendum for IR Program Site 16, (Creosote Dip Tank and Fire Fighting Training Area), dated January 2004, at the former Naval Construction Battalion Center (NCBC) Davisville, RI

Dear Mr. Evans:

Pursuant to § 7.6 of the Davisville Naval Construction Battalion Center Federal Facility Agreement dated March 23, 1992, as amended (FFA), the Environmental Protection Agency has reviewed the subject document and comments are enclosed.

Please evaluate the enclosed and provide responses within the time period required by § 7.6 (e) (2) FFA (45 days) so that we may work together to scope out the source area investigations and risk assessment investigations that are needed at this site.

If you have any questions with regard to this letter, please contact me at (617) 918-1384.

Sincerely,

A handwritten signature in cursive script, appearing to read "Christine Williams".

Christine A.P. Williams, RPM  
Federal Facilities Superfund Section

Enclosure

cc: Richard Gottlieb, RIDEM  
Bill Brandon, EPA  
Steve DiMattei, EPA  
Rick Sugatt, EPA  
Marilyn Cohen, ToNK  
Steve King, RIEDC  
Jim Shultz, EA Engineering, Science and Technology

## EPA Comments on the Supplemental Phase II Investigation QAPP Addendum

### GENERAL COMMENTS

1. As EPA has previously commented, the Navy must address the baseline risk assessment for this site. Only limited soil sampling has been performed to date and this work plan does not address soil sampling for baseline risk assessment purposes. EPA looks forward to working with the Navy to close this data gap.
2. As EPA has previously commented, there is a data gap in the geophysical information gathered along Davisville Rd north of former building 41. The top of bedrock maps need to be updated with additional geophysical work. Please add this to this work plan or provide a schedule for performing such work to close this data gap.
3. As EPA has previously commented, there is a need to again sample the entire monitoring well network for TCL VOC, TAL metals, and MNA parameters to more fully characterize the site and to determine if changes have occurred since the last sampling round. Please add this to this work plan or provide a schedule for performing such work to close this data gap.
4. As EPA has previously commented, there is a need to again gage the entire monitoring well network for water level measurements to more fully characterize the site and to determine if changes have occurred since the last sampling round. Please add this to this work plan or provide a schedule for performing such work to close this data gap.
5. As EPA has previously commented, there is a need to more fully evaluate the subsurface near building E-319 since this is where similar activities were transferred from former building 41 and the EBS program did not evaluate the subsurface in the southern and southeastern side of the building. Please add this to this work plan or provide a schedule for performing such work to close this data gap.
6. It is not clear what the purpose of the supplemental investigation outlined in this Addendum is. The work elements presented in this Addendum do not materially add to completion of the site conceptual model. The work elements that are outlined do not address many of the data gaps previously identified in regard to the Phase I and Phase II remedial investigations.

After review of the Phase II remedial investigation, EPA had identified several areas where there were uncertainties and questions regarding contaminant origin, pathways of migration, and overall hydro geological characterization of Site 16. These concerns included unexplained presence of ethane and benzene, toluene, ethyl benzene, and xylene (BTEX) constituents in the vicinity of the former Building 41 area. There were questions as to whether those contaminants originated from the central area, up gradient to the west,

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or from an unidentified release area to the south of the former Building 41, or a source to the north adjacent to that building. They also included lack of data on groundwater quality and groundwater flow patterns (shallow, intermediate and deep) to the north of the former Building 41 footprint and Davisville Road along an inferred bedrock structural feature and in an apparent groundwater flow path from up gradient. Also, there were questions as to overall shallow groundwater flow patterns around and down gradient of the former Building 41 area and the southeastern quadrant of the central area, since several shallow groundwater wells did not have water table elevations measured.

The proposed additional investigative work is not sufficient to address the questions raised from the Phase II remedial investigation, address data gaps, or facilitate completion of the site conceptual model. Several additional monitoring well locations and/or well screen intervals are necessary along with associated groundwater sampling and analysis to complete delineation of the extent of groundwater contamination originating in and migrating from/and/or through the Site 16 area. In addition, this Addendum makes no provision for a complete round of groundwater elevation measurements including all locations where existing wells have not been evaluated for groundwater elevations, i.e. shallow wells with obstructing pumps. A complete additional assessment of groundwater flow patterns in the shallow, intermediate, and deep zones is necessary, after the installation of additional wells. It is noted that certain additional work is potentially being considered in the HRC® pilot study project. However, work related to filling data gaps and completing development of the site conceptual model must be coherent and not be applied piecemeal. If actual work is covered in other projects due to funding constraints it must still be outlined in one document as being related to supplemental efforts to complete the hydro geological assessment of Site 16.

An additional concern that is raised is the apparent study to assess the cause of the discrepancy between observed soil screening responses and analytical results from subsequent groundwater sampling in those zones. A major portion of this supplemental work appears to be soil borings and analyses to assess this issue. Review of the soil logs does show that there are considerable inconsistencies with correlation of soil screening and subsequent groundwater sampling including not only the "false positives" noted, but also "false negatives," that is, areas where soil screening did not indicate the presence of volatile organic compounds, but which subsequent groundwater sampling did detect. This raises concerns over the quality of the screening process and why it took until near completion of the Phase II for this to be addressed. Further, coupled with the Navy's previous statement concerning elevated pH in monitoring wells (i.e. around pH 12) as being related to poor well construction (or possibly lack of adequate well development) calls into question the quality control of the overall remedial investigation at this site.

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### ***Former Building 41 Area Data Gap***

7. The proposed work outlined in the Addendum does not address the continuing data gap north of the former Building 41 footprint along Davisville Road. This issue has been raised previously by EPA. This area is considered a data gap even if the Navy insists that there is no contributing source area from further up gradient such as the former Nike PR-58 or Site 03 areas. Review of groundwater contours from the Phase I and Phase II Remedial Investigations show a groundwater flow path that moves through this area (although poorly delineated due to limited shallow, intermediate, and deep groundwater monitoring points). This flow path is also shown on the previous Stone and Webster "Zone 4, Deep Ground Water Contour Map, Figure 9," dated October 1995. It is also reiterated that there has not been adequate investigation to rule out the possible contribution of chlorinated volatile organic compounds (CVOC) constituents from the further up gradient locations (Nike PR-58 and/or Site 03 areas).

The Stone & Webster drawing, similar to the Phase I and Phase II Remedial Investigation groundwater maps, shows a pathway originating from the northwest of and flowing through or just to the north of PGU-Z3-10D and extending through the unmonitored area to the north and/or east end of the former Building 41 footprint. There is a scarcity of groundwater quality data for this area and the area up gradient. It is also not clear whether PGU-Z3-10D, a presumed piezometer, has been sampled and analyzed for CVOC constituents. EPA has recommended that this area be investigated during the Phase II Remedial Investigation, which it was not. It has also been recommended that this area be addressed during the preliminary phase of the proposed HRC® Pilot Study to be conducted at the eastern end of the former Building 41 footprint. As of this review, inclusion of investigative work in that area as part of the HRC® study is uncertain. In any event, it should be conducted as a part of completion of the site conceptual model.

### ***Soil Screening Data Gaps***

8. Past soil borings have indicated significant elevated volatile organic compounds at specific intervals that were not investigated by installation of a groundwater monitoring well screen and groundwater sampling. This includes within the central Site 16 area and for one or more wells to the east of the central area to the east of Allen Harbor Road. For some locations, there are also apparent problems with use of soil screening methods and results. Specifically, some areas did not exhibit elevated soil screening levels but did result in elevated volatile organics in groundwater. This raises concerns about the overall characterization of the site groundwater. This concern is briefly discussed in the paragraphs below ("false positives" and "false negatives").

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### *"False Positives"*

Past comments by EPA on the Phase I and Phase II Remedial Investigation monitoring well screen placement noted that screened intervals often did not correlate with the highest detected FID (or photo ionization detector-PID) responses. Elevated FID/PID responses in the soil column usually correlate with the presence of CVOC in soils and groundwater. Past comments from the Navy have suggested that locations with elevated flame ionization detector (FID) soil screening values were due to interferences such as methane. As such, it was not necessarily critical to install a well screen at those intervals.

However, there was no attempt at many locations to use a filter, thereby leaving open the question of whether the elevated values were from methane or not. Therefore, it would appear appropriate to have installed well screens at those intervals. It is acknowledged that at some locations with elevated filtered FID responses, the subsequent groundwater analyses did not result in significant detection of CVOC constituents. These "false positives," however, do not rule out the necessity to investigate areas/intervals where elevated detections were recorded. Soil screening is a critical tool for well screen placement. If use of a FID was problematic, either with or without a filter, then alternative methods such as PID should have been employed.

While the initial Phase I investigation apparently focused on systematic installation of deep groundwater monitoring well screens, possibly on the belief that chlorinated compounds sink, this severely hampered development of the site conceptual model. The Phase II investigation included additional intervals of the aquifer. However, those locations/intervals were investigated only at the behest of USEPA using the available soil screening data, mostly FID with some PID results. Even with the limitations of the soil screening methodology (i.e. FID) numerous locations were identified that should be screened. Subsequent sampling and analysis of groundwater from those locations resulted in elevated CVOC detections in groundwater at intermediate and shallow intervals.

### *"False Negatives"*

There is even more concern with the approach to identifying areas and/or intervals that require investigation using FID methodology in that there appear to be "false negative" volatile organic screening results from the previous soil screening process. That is, review of the soil boring log results show numerous locations where the flame ionization detector (FID) readings were either non-detect, or very low, yet, when groundwater was sampled from those intervals and analyzed, there were elevated CVOC detected. This was especially noteworthy for a number of the deep monitoring wells that had been installed previously, on an apparent preset basis (i.e. regardless of soil screening results). Those wells appear to have been installed primarily during the Phase I Remedial

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Investigation based upon the premise that, due to the physical-chemical nature of the chlorinated compounds, they would be most prevalent deep in the aquifer.

This causes concern for identification of stratigraphic zones that should be addressed in order to define the site conceptual model. That is, those results suggests that even with the soil screening methodology used by the Navy, there are potential areas that exhibit significant CVOC contamination, even though the soil screening process did not indicate elevated volatile organic compounds to be present. Because solvents would most probably be released at the surface through spills or be buried in shallow fill material there is the high potential for vertical migration of those spilled/release solvents to migrate vertically downward and horizontally along lower permeability layers or lenses. Therefore, in the absence of reliable soil screening methodology a more conservative approach to site investigation must be adopted. This more conservative approach dictates that even in the absence of elevated detection of volatile organic compounds, wells should be screened at all locations at more than simply the deep interval.

### ***Site 16 Central Area Data Gap***

9. There are several data gaps in this area. Some of these concerns do not fit into typical responses under the Specific Comments section, but are briefly mentioned here. Most of the concerns relate to the “false negative” issue mentioned above and to lack of monitoring at specific intervals and areas. The preliminary discussion of the observed FID responses to groundwater quality analyses for each of the well clusters within the Site 16 Central area noted below is related to the recommendations at the end of this section. The recommendations provided are in response to the fact that the Navy is proposing additional work under the Supplemental Investigation and that there continue to be data gaps for the site conceptual model.

At MW16-41S/I/D, the soil screening response was a trace, non-detect, and non-detect, for the shallow, intermediate, and deep intervals, respectively. However, the groundwater from those three intervals had approximately 44, 97, and 416  $\mu\text{g/L}$  of CVOC, respectively. This is an instance of the “false negative” FID readings noted above.

In the case of MW16-42S/I/D, the highest FID were for the 20 to 30 feet below ground interval (intermediate screen) with an associated groundwater CVOC concentration of approximately 80  $\mu\text{g/L}$ , while at the deep screen interval, the FID response was 0, with an associated groundwater CVOC concentration of approximately 999  $\mu\text{g/L}$  (“false negative”).

Monitoring well cluster MW16-43S/I/D exhibited both “false negative” and “false positive”. The FID value at the shallow interval was as high as 1,678 parts per million (PPM) with a CVOC concentration in groundwater of approximately 23  $\mu\text{g/L}$ , while the

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deep interval had a FID response of 7 PPM with a groundwater CVOC concentration of approximately 781  $\mu\text{g/L}$ .

A similar response and relationship was observed for MW16-44S/I/D with elevated FID responses for the shallow and intermediate zones and relatively low CVOC concentrations in groundwater sampled from those locations. At the deep interval, the FID response was 0 while the groundwater had CVOC present at a concentration of approximately 679  $\mu\text{g/L}$ , which suggests a "false negative" relationship.

For MW16-45S/I/D the FID response with filter was 500 to 3,089 PPM for the shallow zone with a groundwater CVOC concentration of approximately 5  $\mu\text{g/L}$  that indicates a "false positive" for the shallow zone. The intermediate and deep zones had soil screening values of roughly 0 to 15 PPM, yet, the groundwater CVOC concentrations were approximately 830 and 791  $\mu\text{g/L}$ , respectively. This also suggests a "false negative" relationship for the intermediate and deep screened zones.

Groundwater monitoring well MW16-46S/I/D had both "false positives" and a "false negative." The shallow and intermediate intervals had elevated FID responses with associated very low CVOC responses of approximately 3 and 1  $\mu\text{g/L}$ , respectively, in groundwater. The deep well had a 0 to 13 PPM response for the screened interval, while the groundwater had a CVOC concentration of approximately 368  $\mu\text{g/L}$ .

Finally, while MW16-47S/D did not exhibit any discrepancies, MW16-48S/I/D did not record any CVOC in groundwater for the shallow, intermediate, or deep well screen intervals. The intermediate and deep soil screening also did not indicate elevated FID results. However, the shallow interval exhibited a value of 1,330  $\mu\text{g/L}$  even with a filter attached to the FID. Thus, that interval appears to have been a "false positive."

Because of the less than optimal relationship between soil screening and observed CVOC concentrations in groundwater that exists for this area, consideration should be given to employing more conservative investigative measures in order to fully develop the site conceptual model. In that regard, MW16-40S should include an intermediate and a deep well screen component. A shallow and intermediate well is recommended at MW16-08D, to assess the potential for migration of CVOC from the Site 16 central source areas to the area east of the former Building 41 area via migration along dipping restricting layers or lenses. Also, there is an absence of data in the northeast quadrant. In addition to the proposed well cluster at the former MIP16-24 location in the southeast quadrant, an additional quadrant is needed between MW16-44, MW16-05, and MW16-04. An additional shallow and intermediate well is needed at MW16-29D. While the FID response for the soil screening at MW16-29D did not show elevated response the CVOC in deep groundwater at that location was approximately 1,269  $\mu\text{g/L}$ , a "false negative." The information in the northeast quadrant is necessary to establish whether the CVOC

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detected at MW16-05 is solely due to a source at that location, as the Navy has stated, or is due to migration to that location from up gradient, central area locations.

### ***East of Allen Harbor Road Data Gap***

10. The area east of Allen Harbor Road and down gradient from the Site 16 central area is relatively poorly evaluated, to date. MW16-27D and MW16-28D have had CVOC, 252 and 60 µg/L, respectively, detected in groundwater at the deep zone. Both wells had minimal, if any, detection noted for the FID responses during soil boring. Nonetheless, given the poor correlation of FID levels and CVOC detection, especially the “false negative” results for many of the deep wells, additional assessment in this area is warranted. In particular, installation of intermediate level groundwater monitoring wells at these locations. The proposed MW16-56D/R should also be installed with an intermediate well with sampling of groundwater from those locations included in the next sampling round. The location of proposed MW16-56D/R should be shifted closer to MW16-27D, so that it is approximately equidistant to the distance between MW16-27D and MW16-28D.

There are concerns with the data collected from several additional wells across Allen Harbor Road, particularly MW16-49D, and MW16-50D. Review of the soil boring log for MW16-49D shows that there were elevated FID (with filter) responses from 10 to 22 feet, and 28 to 30 feet, yet, no monitoring well screen was placed in that interval. There were smaller FID responses at other intervals including 32 to 34 and 76 to 78 feet below ground level. At MW16-50D, there were elevated FID responses (without filter) from 14 to 28 feet and 84 to 88 feet below ground surface. While the upper FID layer may be due to fill (i.e. notation of sea shells and wood) there is no analytical data for groundwater at this level. Given the uncertainties in FID response to CVOC in groundwater, a conservative approach should be taken to evaluating CVOC concentrations in groundwater. Both of these two wells should have an intermediate well installed with subsequent groundwater collection and analysis.

### ***Resource Allocation***

11. While above paragraphs recommend additional groundwater monitoring wells and sampling, one or more of the locations/well screen intervals that are proposed in this Addendum do not appear to be critical, and may be eliminated in order to conserve resources. To that extent, monitoring wells at MW16-03R, MW16-05R2, and MW16-57I/D may not be beneficial. Substitution of those resources to the above recommended locations would appear to be more beneficial.

Also, the soil borings proposed may also be either eliminated or reduced in number. Specifically, it is more important to understand the groundwater quality at down gradient

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locations such as the northeast quadrant of the Site 16 central area or the southern boundary with Davisville Road, than exact quantification of the material at locations that were interpreted not to contribute to CVOC contamination in groundwater at those locations. This sampling may be beneficial; however, it may not be cost-beneficial if funding considerations are a concern.

### SPECIFIC COMMENTS

1. *Section 2.1, Introduction:* Specific comments to the bullets contained in this section are provided in the comments on the Table 2-1 entries since those entries are repetitions of the bullets provided in this section. However, overall, the objectives stated in this section do not provide a rational and coherent approach for completion of the development of the site conceptual model. Review of the data contained in the Phase I and Phase II Remedial Investigation Reports indicates that there are substantial data gaps in regard to source areas, routes of migration, and extent of contaminated groundwater migration at this site. The work proposed in this Addendum, while providing additional data, will not materially add to the completion of the site conceptual model.

There continues to be a data gap, for instance, between the former Building 41 footprint and Davisville Road. There is a data gap at the northeast quadrant of the Site 16 central area where there is uncertainty as to origins of CVOC contamination at MW16-05S/I/D/R. There is also uncertainty in the distribution and migration pathways for contaminant migration along the southern boundary of the Site 16 central area along Davisville Road, specifically, in the direction of MW16-40S and MW16-08D and whether this impacts the groundwater to the east of the former Building 41 footprint. Lastly, there is considerable uncertainty in groundwater quality, especially in the intermediate groundwater at locations to the east of Allen Harbor Road. Even though groundwater appears to migrate in that direction, there is no evaluation of intermediate groundwater quality even though soil screening suggests elevated CVOC contamination in the intermediate groundwater. The only data gap that may be addressed by this work is the characterization of hydro geology and evaluation of groundwater quality in the southeaster quadrant of the Site 16 central area.

Further, the rationale for attempting to characterize material within the Site 16 central area that apparently does not contribute to CVOC or SVOC contamination to groundwater or the further exploration of deep bedrock groundwater is not understood, especially in light of the existing data gaps at the site. Labor, equipment, and analytical resources to conduct that evaluation would more effectively be applied to fill data gaps that affect development of the site conceptual model. While the stated intent of the soil boring and sampling work is to evaluate the cause of elevated FID responses when little or no CVOC or SVOC contamination is noted in groundwater, a more critical question is why so much

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work was performed i.e. Phase I and Phase II Remedial Investigations, before this became an issue. Review of the correlation or lack thereof of FID responses and groundwater sample results points to a more serious concern including improperly operating equipment. At the very least, why so much of the screening data was collected without a filter (FID) even when it was postulated by the Navy that there were interferences with naturally occurring organic matter.

2. *Table 2-1, MW16-03R:* It is not clear why a bedrock groundwater monitoring well is proposed in this area, especially given the uncertainties in extent of groundwater contamination at other locations of the site. The location of MW16-03S/D is down gradient from the Site 16 central area where there has been documented release of CVOC. However, groundwater quality at MW16-03S and MW16-03D does not appear to be impacted by releases at the Site 16 central area. Sampling has shown groundwater quality at MW16-03S/D to be at non-detectable levels. Please clarify so that we may discuss this issue.
3. *Table 2-1, MW16-05R2:* While the installation of an additional bedrock well may be beneficial at this location, it is not clear that it is cost-beneficial relative to deficiencies in groundwater quality data and lack of wells at other locations. In particular, there is uncertainty as to contaminant distribution in the northeastern quadrant of the Site 16 central area. The Navy has interpreted contaminants at MW16-05S/I/D to be due to a source release at that area. EPA interprets the contaminated groundwater at that location to be derived at least in part, if not totally, from migration from an up gradient source location such as the Former Fire Training Area.
4. *Table 2-1, MW16-44R2:* A question similar to that for MW16-05R2 is posed regarding the installation of an additional bedrock well at this location. Groundwater at MW16-44R already exhibits significant levels of CVOC contamination. Additional information and data points are usually valuable. However, given the data gaps that exist elsewhere, there is no cogent reason detailed in the document for installation of a deeper bedrock well at this location. Please clarify so that we may discuss.
5. *Table 2-1, MW16-56D/R:* As discussed in the General Comments, this well location should have an intermediate well included. The intermediate zones of groundwater at this site have been documented to exhibit elevated concentrations of CVOC constituents. Additionally, FID soil screening has often resulted in "false negatives" such that installation of an intermediate well should not be linked to detection of elevated FID responses. Elevated responses, however, may be used to position the exact location of the intermediate well. This well cluster should be relocated as described in the comments below on Figure 6-1. It should be moved further to the northeast closer to MW16-27D/R.
6. *Table 2-1, MW16-57I/D:* It is not clear what the purpose of the installation of this well

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- pair is. Review of the soil screening results and the groundwater quality results for MW16-39I/D, located up gradient of this proposed location, does not provide indications of groundwater quality impact. The groundwater quality from both of those wells was described as non-detect for CVOC constituents. Again, additional information and data points including at this location may be useful. However, given the data gaps that exist at more critical locations, it would appear that redirection of resources for this well pair would be more cost-beneficial at fully delineating the site conceptual model. Also, while an intermediate well would be recommended for most locations at this site, it is not clear why an intermediate well is proposed at this location, but not at other locations, including the newly proposed MW16-56D/R. Please clarify so that we may discuss this issue.
7. *Table 2-1, SB-07a, -07b, -07c:* The rationale for this additional work is not clear. If the material in the fill area does not contribute CVOC or semi-volatile organic contaminant (SVOC) contaminants to groundwater, it would appear that this material is not a contaminant or constituent of concern. Further evaluation of this material may be of interest; however, EPA believes it does not make cost-beneficial sense when there are other areas of the site that need to be assessed in order to fully develop the site conceptual model.
  8. *Table 2-1, SB16-41:* See Specific Comment 6 above. Also, rather than try to determine what material is contributing a filtered FID response without contributing to CVOC or SVOC contamination in groundwater, it may be beneficial to assess why there is a general lack of correlation for many of the “false negative” FID readings, with and without filtering. Was there an operational or equipment problem?
  9. *Table 2-1, SB16-44:* See Specific Comment 6 and 7 above.
  10. *Table 2-1, SB16-45:* See Specific Comment 6 and 7 above.
  11. *Table 2-1, SB16-46:* See Specific Comment 6 and 7 above.
  12. *Page 6-1, Section 6.1, Project Overview:* Specific comments to several of the bullets contained in this section are provided in the comments below relative to Table 6-1 since the information contained is repetitious. However, as noted in the General Comments above, several of the proposed monitoring well locations would best be reallocated to other locations. This would further collection of useful data to support the completion of the site conceptual model. The proposed wells including MW16-03R, MW16-05R2, MW16-44R2, and MW1657D/R should be used for that purpose.
  13. *Page 6-2, Section 6.3.1:* It is not clear how data collected during the proposed work will fill data gaps and foster completion of the site conceptual model. It appears that the

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report is likely to be simply a compilation of additional data, much of which does not address identified data gaps. EPA always welcomes additional data, however, with our suggestions implemented the Navy will have a more cost effective product.

14. *Figure 6-1:* The location of MW16-56D/R should be moved to the northeast to a location that is equidistant from MW16-27D, similar to the distance from MW16-27D and MW16-28D. Also, as discussed, above, this well cluster should include an intermediate monitoring well.
15. *Figure 6-1:* Several wells shown on this figure should be reallocated to other locations to address data gaps in a more cost-beneficial manner. In our opinion, the only two well sets needed are MW16-01R and MW16-56D/R (moved and with an intermediate well added). The others should be relocated.
16. *Page 8-1, Section 8.1:* As discussed in the General Comments and Specific Comments for Table 2-1, EPA believes that the proposed monitoring wells will not materially fill data gaps and will not contribute to development of the site conceptual model. Adequate rationale is not provided in Table 2-1 especially in terms of what has been presented in the Phase I and Phase II Remedial Investigation Reports.
17. *Page 8-2, Soil Sampling:* It is not clear what benefit sampling of soil that apparently does not contribute to CVOC or SVOC contamination of groundwater (as is stated in this Addendum) will be. Please clarify in the text.
18. Add to table 2-1, 9-1, or other appropriate table the exact depths proposed for soil sampling.
19. Table 8-1 - EPA Region 1 has replaced the analytical methods for methane, ethane, and ethene with the Technical Guidance for the Natural Attenuation Indicators: Methane, Ethane, and Ethene (July 2001). The guidance can be found at the following website;  
<http://www.epa.gov/region1/measure/Natatten.pdf>