



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

March 11, 1993

Francisco La Greca
U.S. Department of the Navy
Northern Division
10 Industrial Highway
Code 1823, Mail Stop 82
Lester, PA 19113-2090

received
3-17-93

RE: US Navy's Response to EPA Comments on the Draft Phase II Remedial Investigation Draft Final Report, Naval Education and Training Center, dated September 1992.

Dear Mr. La Greca:

Attached you will find EPA's evaluation of the Navy's response to comments on the Phase II RI workplan. The attached evaluation focused on the Navy's responses which require further clarification.

As you indicated in the Navy's response to comments, the Navy did not provide responses to comments which did not require further clarification. EPA therefore will not be able to evaluate the validity of the Navy's responses until the final report has been submitted and reviewed.

EPA's evaluation follows the number assignment from the original set of comments. The Navy should review the outstanding issues identified in this letter, revise the Phase II remedial investigation workplan to be consistent with these attached comments and submit to EPA.

If there are any questions with these comments, you should feel free to call me at 617/573-9614.

Sincerely,

A handwritten signature in cursive script, appearing to read "Andrew F. Miniuks".

Andrew F. Miniuks, Remedial Project Manager
Federal Facilities Superfund Section

cc. Charles Porfert, EPA
Susan Svirsky, EPA
Greg Fine, RI DEM
Paul Kulpa, RI DEM
Mike Kulbresh, CDM



Attachment

Evaluation of Navy's Responses to EPA Comments on Phase II Remedial Investigation Workplan (September 1992)

General Comments

Original EPA Comment

2. Neither the QAPjP nor the Field Sampling Plan for each of the individual sites nor the Field Sampling Methodology Plan provide information on the filtration of water samples for dissolved metals. Such samples should be immediately filtered on site at time of collection using a 0.45 micro filter, and preserved immediately after filtration. Also, no clarification is given in either the QAPjP or in the site sampling plans about the reason(s) for using only the top one foot of collected two-foot soil boring samples.

VOLUME III-1 - McAllister Point Landfill

Original EPA Comment

26. Page 15, 3rd ¶ - It is stated that the 0- to 1- interval of the split spoon sample from the test borings and well borings will be analyzed for the full TCL/TAL list. It seems that the volume may not be sufficient to fill all the sample containers. How will TRC handle this situation if it arises?

EPA's Comment on Navy Response

Based on the information gathered from the 23rd Technical Review Committee (TRC) meeting held in Newport, Rhode Island on January 23, 1993, it became apparent that the workplan requirements addressing the collection and analysis should be modified. More specifically, the collection of surficial soils for the purpose of determining the presence or absence of volatile organic compounds (VOCs), should be collected from 0.5 to 1.0 feet below ground surface. All other fractions of soil samples requiring analysis should be homogenized prior to filling the remaining sample containers.

Revise the workplan to clearly indicate that the soil samples collected for the analysis of Volatile Organic Compounds (VOCs) will be collected from 0.5 to 1.0 feet below ground surface. This revision must also ensure that the other soil fractions collected for laboratory analysis will be homogenized prior to filling the remaining sample containers.

VOLUME III-1 - McAllister Point Landfill

Original EPA Comment

33. Page 17, Last ¶ - The text states that ground water samples will be collected from each of the monitoring wells. It is unclear, however, whether samples will be collected from Phase II wells only or from Phase I wells also. Please clarify this statement.

EPA's Comment on Navy Response

Revise the workplan to clearly state whether or not the Phase II wells will be analyzed for the Target Compound List (TCL) pesticides and PCBs. In addition, revise the workplan to clearly state whether or not the Navy will be testing the Phase I/Confirmation Study Wells for the presence of TCL PCBs. The testing of the Phase I/Confirmation Study Wells omitted the analysis of pesticides.

Original EPA Comment

37. Page 18, ¶ 4 - Please indicate the proposed locations of the multi-level piezometers on a figure.

At each location, how many piezometers will be installed? Will the piezometers be surveyed such that hydraulic head data can be obtained? Will conductivity and salinity measurements be obtained using field monitoring devices (e.g., Horiba water quality meter).

As discussed in EPA comment letter on the Phase I RI report, it is recommended that a continuous water level monitoring network be installed to support the RI/FS activities underway at this site. Continuous water level measurements have been used at other Superfund sites to identify off-site factors which influence water level variations and ground water flow, such as pumping and injection wells. Off-site pumping may affect the rate and direction of ground water flow.

In addition, these measurements will be very useful for evaluating landfill cap performance for McAllister Point. Continuous water level measurements collected from landfill interior wells prior to and after cap installation can provide data to verify relaxation of the ground water mound and provide information with regard to the high water tide water level and its position with regard to waste materials. In addition, the comparison of water level response and precipitation events will provide data to confirm the integrity of any proposed cap design.

As mentioned previously, if waste is to be left in place at this site, the landfill closure design will need to take into account not only sea level rise/tidal influence but the likely concurrent increasing severity of storms.

Although continuous water level measurements were collected during Phase I activities over a three-day period, baseline conditions can only be ascertained if the monitoring program is conducted for a minimum of three months. The water level measurement frequency should be at least every 15 minutes. After recorders are installed, they should be checked weekly for two weeks (check measurement, data dump, hydrograph constructed) and then monthly thereafter.

At the end of the three months, hydrographs should be evaluated to determine the number and locations for continued water level recorder activity. The need for further monitoring can be reevaluated annually, based on proposed construction or land use changes.

EPA's Comment on Navy Response

Figures 5 and 9 were omitted from the response to comments. It is still unclear how many multi-level piezometers will be installed at each location.

Revise the workplan to clearly state the number of piezometers that will be installed at each location.

VOLUME III-2 - Old Fire Fighting Training Area

Original EPA Comment

39. The Field Sampling Plan for this site makes no reference to the investigation of the source of the oily sheen observed flowing from an outfall pipe on the northwest edge of the site during an EPA site visit last year (see EPA Phase I RI comment #24). The Navy stated in its response to comment package that the Phase II RI activities at this site would investigate the source of the oily sheen.

EPA's Comment on Navy Response

The Navy's response to original comment number 138 is different from the response for this comment.

Revise the workplan to clearly identify the analytical parameters for the aqueous samples.

Original EPA Comment

50. Page 12, § 3.4.3, ¶ 1 - Was a geophysical survey conducted on the mound located in the western corner of the site? Please note the results in the section to justify the lack of test pitting versus test pitting of the central mound.

EPA's Comment on Navy Response

Revise and submit Figure 9 which clearly identifies the location of the proposed western test pit. Include in this revision a description of the analytical samples to be gathered from the proposed western test pit.

VOLUME III-3 - Tank Farm Four

Original EPA Comment

70. Page 16, ¶ 3 - Consideration should be given to adding TPH analyses to the ground water samples.

In addition, slug tests should be able to be conducted on water-table wells (note rising head only) if a short enough slug is used, and care is taken to avoid having the slug come in contact with the pressure transducer.

EPA's Comment on Navy Response

As currently written, the Navy's response indicates that TCL volatiles and semivolatiles are proposed for the analysis. It is unclear if the TCL pesticides/PCBs were omitted since the Navy argues that TPH analysis is not warranted since the analysis includes TCL volatiles and semivolatiles.

Revise the workplan to clearly state the number and location of groundwater samples that will be analyzed for TCL pesticides/PCBs.

APPENDIX D

Original EPA Comment

110. Page 9-5, § 9.3.6 - The text and Table 3 mentions dioxin/furans; however, there is no mention of sample collection and analyses for dioxin/furans in other sections of the document. Will additional samples be collected during Phase II activities for dioxin/furan analysis? What is the status of samples collected during Phase I activities?

EPA's Comment on Navy Response

Revise Section 7.0 "Analytical Procedures" of this appendix, to specify that the analysis of dioxin/furan is to follow modified Method 8280 as defined in SW-846.

VOLUME V - Risk Assessment Plan - Human Health Evaluation

Original EPA Comment

114. Page 2-1, § 2.1 - Since BNAs include numerous and varied compounds, specify the predominant BNAs detected, e.g. PAHs and phthalates. In addition, highlight inorganics of concern.

Tables 2 through 5 should be referenced since they list Phase I COCs.

EPA's risk range and point of departure should be defined prior to discussing Phase I risk results.

Given the inappropriate treatment of "UJs" in the Phase I Risk Assessment, does the discussion of risk reflect change in treatment of "UJs" as nondetects? For example, are CaPAHs in ground water still a major contributor to risk in the McAllister Point Landfill? Is thallium in soils at Tank Farms Four and Five a major contributor to the total hazard index?

Discuss more specifically how data from background samples will be used as "reference points."

EPA's Comment on Navy Response

EPA still believes that the Navy has misunderstood the use and interpretation of analytical data in the risk assessment which has been qualified with a "UJ". Compounds which have been qualified with a "U", indicating non-detection, or compounds which have been qualified with a "UJ", indicating an estimated non-detection, should be used in calculating the average exposure of a compound. More typically, when determining the compound's average concentration, 1/2 of the detection limit is used for those compounds which have been qualified with a "U" or a "UJ".