



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

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

April 30, 1992 ³

received
5-6-93

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

RE: Review of the Phase II RI/FS Work Plan - Final Draft, Naval Education and Training Center, Newport, RI, March 1993

Dear Mr. LaGreca:

Attached you will find the results of the US Environmental Protection Agency's (EPA's) evaluation of the Navy's Draft Final Work Plan. EPA's evaluation focused on whether or not this submittal had incorporated previously submitted comments.

As a general comment, I believe that there is some confusion regarding the interpretation and use of analytical data which has been qualified with a "UJ". A data value which has been qualified with a "UJ" indicates that the sample had been analyzed as a "non-detect" value, yet there was some uncertainty associated with the detection limit. Therefore, the use of this data point should not be interpreted as a detected value in the risk assessment.

In addition, EPA is concerned that tributyltin antifouling paints may have been disposed of in McAllister Point Landfill and we are looking forward to additional information on this subject.

Pursuant to § 7.6(e) of the NETC Federal Facility Agreement (FFA), EPA is providing written comments on this draft primary document, and with incorporation of the attached comments, EPA concurs with the draft final document as submitted.

If there are any questions regarding this evaluation and comment letter, you should feel free to call me at 617/573-9614.

Sincerely,

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

Attachment

cc: Paul Kulpa, RIDEM
Greg Fine, RIDEM
Michael Kulbersh, CDM-FPC



Outstanding Comm nts

VOLUME I - Background Investigation Summary

Original Comment:

10. Table 2 - Status Summary of NETC Hazardous Waste Sites - As discussed above, since FUDS are not in fact part of the NETC facility, they should not be included in a list of "NETC hazardous waste sites." So as to avoid any possible confusion, it is recommended that FUDS be discussed in a separate table.

EPA Evaluation:

This comment was not addressed. The Navy should revise Table 2 to clearly indicate the sites with FUDS status.

Original Comment:

11. Figure 1 - The portion of Gould Island that is currently owned by the State of Rhode Island should be unshaded.

EPA Evaluation:

Please revise this figure to include a key describing the meaning of the shading.

VOLUME III - Field Sampling Plans

Original Comment:

16. Consideration should be given to installing nested monitoring wells in both upgradient and downgradient locations at all sites to determine vertical gradients and the presence/absence of DNAPLs.

EPA Evaluation:

The Navy should ensure that nested monitoring wells are installed in both upgradient and downgradient locations for the Old Firefighting Training Area and Tank Farm Four. In particular, the Old Firefighting Training Area, as indicated in Volume III-2 - Table 4, wells MW-6, MW-9, and MW-11 will be nested but not MW-2 (rock well).

VOLUME III-1 - McAllister Point Landfill

Original Comment:

25. Page 15, § 3.5.1 - The rationale for SS-29 and SS-30 is to investigate surface soil quality of the suspected site cap. Information presented in the site geology (Section 2.4) indicates the cover material or "cap" was noted in the central portion of the landfill around B-3, B-4, B-5 and B-6. "Cap" material was also encountered in the northern portion and southern end of the landfill. Are SS-29 and SS-30 actually located to determine the existence of the cap in this area, or is it known to exist here?

EPA Evaluation:

Figure 6 shows SS-29 and SS-30 located at the southern end of the landfill not in the central portion of the landfill in the vicinity of B-3, B-4, B-5, and B-6. It was noted that cap material was discovered on the southern end of the landfill. The locations of the two soil samples were not moved into the central portion of the site as indicated in the response to comments.

The Navy should indicate whether or not the SS-29 and SS-30 been located in an area known to contain cap material.

Original Comment:

31. Page 17, ¶ 2 - The text states that soil samples from just below the depth of the water table will also be collected from each well location for TOC analysis, cation exchange capacity analysis, and grain size distribution. Please indicate these samples in Table 1 of this Sampling Plan. This comment also applies to the comparable sections of Vols. III-2, III-3, and III-4 of this Work Plan. In addition, what are the analytical methods proposed for TOC, cation-exchange-capacity and grain-size?

EPA Evaluation:

This comment not completely addressed. The Navy should provide the following analytical methods which were not addressed: TOC, cation exchange capacity and grain size.

VOLUME III-2 - Old Fire Fighting Training Area

Original Comment:

49. Page 12, ¶ 2 - For those borings constructed into monitoring wells, a select percentage of samples collected from the saturated zone should be analyzed for porosity. The use of the porosity analysis will aid in determining groundwater flow/velocity of contaminant migration. Samples should be collected upgradient and downgradient of the waste area(s) and taken from the respective aquifer(s).

EPA Evaluation:

The Navy should revise the workplan to ensure that a select percentage of samples will be collected from the saturated zone to be analyzed for porosity. These samples should be collected upgradient and downgradient of the waste area(s) and taken from the respective aquifer(s).

Original Comment:

76. Table 1 - The table should be revised to indicate that 26 TAL ground water analyses will be performed, not 24.

EPA Evaluation:

The Navy should revise Table 1 to be consistent with Table 4 and to reflect the collection of 15 Surface Water Samples and 12 Sediment Samples.

VOLUME III-4 - Tank Farm Five

Original Comment:

81. Page 4, § 2.2, ¶ 2 - When were the 1.75 acres of land, located in the eastern corner of the site along Greene Lane, sold to the Town of Middletown?

EPA Evaluation:

The Navy should revise the workplan to clearly indicate the date when the 1.75 acres of land, located in the eastern corner of the site along Greene Lane, were sold to the Town of Middletown.

Original Comment:

82. Page 7, § 2.3, ¶ 4 - In the previously conducted surface water and sediment assessment, TPH was detected with levels increasing with distance downstream. Does this mean downstream locations offsite or in downstream locations onsite? (Was TPH detected in onsite stream samples?)

EPA Evaluation:

The Navy should revise the workplan to clearly state whether or not TPHs were detected in onsite stream samples.

Original Comment:

83. Page 10, § 2.5, ¶ 3 - The Ground Water Hydrology section states that six Phase I RI wells were installed and five additional wells were installed as part of the tank closure investigation. Then it states that water levels were measured in all 12 wells. Figure 4 shows 14 wells. Please clarify which wells were installed as part of each study.

Well clusters should be considered to determine vertical hydraulic gradients as in other sites.

EPA Evaluation:

The Navy should consider installing well clusters at this unit to determine vertical hydraulic gradients.

APPENDIX B - Field Sampling Methodology Plan

Original Comment:

102. Page 24, § 10.0 - The accuracy of the survey should be stated. For example, the horizontal locator will be within $\pm 1'$, while the vertical locator will be to within $\pm 0.1'$.

EPA Evaluation:

The Navy should revise the workplan to include the accuracy of the horizontal locator.

APPENDIX D

Original Comment:

103. The QAPjP considers all but one of the sixteen elements of QAMS 005. The omitted element that should be included concerns the Performance and Systems Audits. The QAPjP is not complete in addressing QA/QC aspects of the Work Plan. It identifies no analytical methods for field measurements or for non-CLP analyses. Specific methods/procedures need to be given for determinations such as: pH, temperature, specific conductivity, DO, salinity, alkalinity, BOD, TOC, AVS, total chloride, total suspended solids, grain size, cation exchange capacity, and hardness.

EPA Evaluation:

The Navy should revise the workplan to include a discussion of the specific methods which will be used to determine alkalinity, BOD, TOC, AVS, total chloride, grain size, cation exchange capacity and hardness.

Original Comment:

109. Page 6-1, § 6.0 - The text states that the laboratory selected to perform the non-CLP analyses will indicate the calibration procedures and QC frequencies to be used. Some minimum requirements should be indicated in the work plan based on the Navy NEESA data quality requirements and CLP data quality requirements.

EPA Evaluation:

The Navy should revise the workplan to address this comment.

VOLUME V - Risk Assessment Plan - Human Health Evaluation

Original Comment:

120. Tables 2 through 5 - General Comments

Change spelling of 3,3'-dichlorobenzene to 3,3'-dichlorobenzidine.

COCs in these tables should reflect treatment of "UJ" data as nondetects. For example, each of the volatiles listed as COCs in Table 2 were reported as "UJ" values only.

COCs don't necessarily correspond to contaminants of concern discussed in Section 2.1. Please clarify.

EPA Evaluation:

The Navy should revise the workplan to ensure that Tables 2 through 5 reflect treatment of UJ data as non-detects.

Original Comment:

122. Table 5

Why aren't petroleum-related VOCs listed as COCs?

EPA Evaluation:

Although petroleum-related VOCs were added to the list of Contaminants of Concern (COC), benzene was not included on this list. The Navy should revise the workplan to include benzene as a COC.

Original Comment:

126. Page 4, § 2.0 - There are a number of inconsistencies in this Section and Section 2.0 of the Human Health Evaluation (Volume V). For example, the size of the site is stated as 1,374 acres in the Ecological Evaluation and 1,063 in the Human Health Evaluation. Please explain.

EPA Evaluation:

This comment appears to be partially addressed. The size of the site is stated as 1,063 acres in the Human Health Evaluation. This should be changed to 1,431 acres. Please revise the workplan accordingly.

Original Comment:

127. Page 14, § 3.2 - The title of this section should be revised to include both aquatic and terrestrial habitats.

EPA Evaluation:

This comment appears to be unaddressed. The title of Section 3.2 should be changed to "Characterization of Terrestrial and Aquatic Habitats".

ATTACHMENT B

Original Comment:

139. Page 16, Comment #31 - The Navy stated in its response to this comment that off-shore sediment and biota sampling will be performed during the Phase II investigations; however, these sampling activities are not discussed in the draft Phase II Work Plan. According to discussions held during the August 6, 1992 Technical Review Committee (TRC) meeting, however, a separate work plan addressing this activity was to be completed prior to off-shore work. What is the status of this sampling effort?

EPA Evaluation:

The Navy should revise the workplan to include a revised update on the status of the off-shore sampling effort. Include in this revision a description the expected date of submission and any potential impacts to the integrity of the results if the sampling is conducted in the summer months, rather than the spring months.