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EMAIL REGARDING REGULATORY COMMENTS ON MARCH 2011 MONITORED NATURAL  
ATTENUATION SAMPLING TECHNICAL MEMORANDUM AT SITE 8 NETC NEWPORT RI  
6/20/2011  
U S EPA REGION I

## Ropp, Jim

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**From:** Lombardo.Ginny@epamail.epa.gov  
**Sent:** Monday, June 20, 2011 9:31 AM  
**To:** maritza.montegross@navy.mil; Ropp, Jim  
**Cc:** Moore, Deborah J CIV NAVFAC MIDLANT, PWD Newport; Gary Jablonski; Kenneth\_Munney@fws.gov; steinberg@mabbett.com; Parker, Stephen; kemp@mabbett.com  
**Subject:** Re: Newport NUSC (Site 08) March 2011 MNA sampling tech memo  
**Categories:** Newport

Maritza-

EPA has the following comments on the MNA Tech Memo. Please consider these as Navy prepares the revised Draft FS for NUSC. Thanks.

1. The level of detection for several analytes including tetrachloroethene, trichloroethene, and vinyl chloride exceeded the project action limits for all samples.
2. The MNA Tech Memo states at the bottom of page 2 that: "Multiple lines of evidence are being considered to evaluate whether natural attenuation has been occurring and whether conditions will allow it to continue to occur. This includes evaluations of temporal and spatial trends (showing decreasing COC concentrations and plume footprint), the presence of biodegradation daughter products, and comparisons of COC and daughter product footprints to geochemical footprints." However, only a very limited temporal trend evaluation is attempted in the MNA Tech Memo and that evaluation states that only "limited historical sampling events are available to develop trend graphs and/or perform statistical evaluations (i.e., only 2 to 4 data points are available per well)." Data are graphed for two wells that each have four data points and the text states that "The other wells have only been sampled since 2008." The MNA Tech Memo briefly summarized the results of the supplemental groundwater samples performed in March 2011 and presents the analytical results and backup documents; however, essentially no analysis was provided. Navy did not attempt in this document to demonstrate that MNA was occurring through presentation of charts, maps, trends, or statistics. As EPA has already pointed out to Navy, there is currently insufficient data available to support a MNA remedy for this site. With the limited amount of data available, a statistical or trend analysis would have limited significance. Navy has agreed to consider the collection of additional data as the project moves forward and the feasibility study is developed. If MNA is to be proposed as a remedial component in the FS, additional data collection to support the viability of MNA will be needed.
3. p. 4 of 5: In the first sentence of the first bullet, please review the listing of 1,1-DCE and ethane in the first sentence as these are not typical daughter products of PCE and TCE degradation.

Was the intent to list ethene rather than ethane?

Please contact me if you wish to discuss.

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| 05/25/2011 04:05 PM |  
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| Newport NUSC (Site 08) March 2011 MNA sampling tech memo |  
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All:

FYI – You should be receiving the tech memo tomorrow via FedEx.

Let me know if you do not receive it.

thanks

Jim Ropp, P.E. | Project Manager

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