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LETTER AND COMMENTS FROM U S EPA REGION I REGARDING DRAFT FINAL REVISED
SAMPLING AND ANALYSIS PLAN FOR DATA GAPS ASSESSMENT TANK FARM 3 NS
NEWPORT RI
11/1/2012
U S EPA REGION I

EPA 1112



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION I

5 Post Office Square, Suite 100
Boston, MA 02109-3912

November 1, 2012

Mr. Roberto Pagtalunan
NAVFAC MIDLANT (Code OPNEEV)
Environmental Restoration
Building Z-144, Room 109
9742 Maryland Avenue
Norfolk, VA 23511-3095

Re: Draft Final Revised Sampling and Analysis Plan - Data Gaps Assessment for Tank Farm 3

Dear Mr. Pagtalunan:

Thank you for the opportunity to review the *Draft Final Revised Sampling and Analysis Plan (SAP)* for Category 1 Areas at Tank Farm 3 dated October 2012. The SAP presents the sampling design and rationale and the analytical and data assessment requirements for the project in accordance with the requirements of the *Uniform Federal Policy for Quality Assurance Plans* and *EPA Guidance for Quality Assurance Project Plans*. This additional sampling is required to close data gaps based on the limited analytes included in prior sampling events. Detailed comments are provided in Attachment A.

Concerns remain regarding the effectiveness of the proposed groundwater monitoring wells to detect contamination from upgradient sources because at the wells targeted for sampling, groundwater is at the bedrock elevation in one and 6 to 14 feet below bedrock in the others. Therefore, there is significant uncertainty that the targeted wells will intercept groundwater migrating from the respective Category 1 Areas.

Because of the uncertainty regarding the effectiveness of the bedrock wells to intercept groundwater from upgradient contaminated areas, it is necessary to retain the protection of groundwater soil screening levels (SSLs) in order to eliminate groundwater as a medium of concern. Detecting no contamination in the groundwater wells proposed for sampling will not in itself eliminate groundwater as a medium of concern without further investigation if the protection of groundwater SSLs are exceeded. Please retain the protection of groundwater SSLs as PSLs.

I look forward to working with you and the Rhode Island Department of Environmental Management toward the cleanup of the Tank Farms. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kimberlee Keckler".

Kimberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

**cc: Pamela Crump, RIDEM, Providence, RI
Deb Moore, NETC, Newport, RI
Steven Parker, Tetra Tech-NUS, Wilmington, MA**

ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. 26, §10.1	Paragraph 2 should also refer to metals because of the past presence of batteries at Building 227.
p. 27, §10.1	Please revise the last sentence because PCBs are have been detected at this AOC.
p. 28, §10.3	The last paragraph states that groundwater flows northerly in the western portion of the site. Owing to a decrease in the well density on the western portion of the site, the groundwater flow direction there is uncertain and not clearly in a northerly direction. This impacts the viability of GZ-314 as an appropriate downgradient well for monitoring AOC 020.
p. 33, §10.5	<p>a) The second white bullet states that groundwater flow at the burning pit is to the northeast. The groundwater contours added to Figure 2 suggest that groundwater flows to the north at the burning pit, although the well density is limited. It is therefore not clear that GZ-301 is appropriately located downgradient of the burning pit to detect migrating contaminants. If contaminants are detected in soil in excess of the protection of groundwater SSLs, further investigation of groundwater, possibly with additional well(s), will be necessary to determine any groundwater contamination or influence from the burning pit.</p> <p>b) The second white bullet refers to the analytes for groundwater sampling at AOC-001. The list does not include dioxins, although there is an MCL for dioxins and dioxins are a potential contaminant of concern in soil at AOC-001. If dioxins are detected in the soil samples at AOC-001 at concentrations in excess of the protection of groundwater SSLs, then analysis of groundwater samples for dioxins will be required. The Navy should plan to collect and hold groundwater samples for dioxin analysis pending the soil analytical results.</p>
p. 34, §10.5	<p>a) The white bullet associated with Building 227 only refers to the release of PCBs or metals to the subsurface soil. Table 17-1 includes surface and subsurface soil sampling at Building 227. Please edit the text to be consistent with Table 17-1.</p> <p>b) The second last sentence should acknowledge potential exposure if contaminated subsurface soil is brought to the surface during site development.</p>
p. 36, §11.1	Problem 2 for AOC 020 refers to the investigation of groundwater downgradient. Because groundwater is located within the bedrock and the groundwater flow direction at AOC 020 is uncertain, if contaminants are detected in soil above the protection of groundwater SSLs then further investigation of groundwater - possibly with additional well(s) - will be required to evaluate the transformer area and groundwater contamination.
p. 37, §11.2.1	a) Regarding the third bullet, the Navy has typically been reporting all elevations relative to Navy Mean Low Water at Newport and elevations not in that datum converted to it. EPA assumes the Navy will do the same at Tank Farm 3.

- b) Regarding the fourth bullet, a PID is expected to have limited value in assessing contaminated intervals based on the contaminants of interest. Please be cautious in selecting soil intervals to analyze based on PID readings.
- p. 38, §11.2.2 First bullet states that PCBs and metals are the only analytes needed for groundwater; however, this is not consistent with Table 17-1 which also requires analysis for VOCs and EDB. Please correct the text to be consistent with Table 17-1. However, because dioxins are also an analyte of concern for soil and because there is an MCL for dioxins, if dioxins are detected in the soil samples at AOC-001 at concentrations in excess of the protection of groundwater SSL then analysis of groundwater samples for dioxins will also be required. Navy should plan to collect and hold groundwater samples for dioxin analysis pending the soil analytical results.
- p. 54, WS 15a a) EPA does not concur with the elimination of protection of groundwater SSLs as PSLs because of the concern regarding the effectiveness of the bedrock wells to capture migrating contamination.
- b) Please clarify why previously-listed ecological SSLs were removed from the dioxins/furans list when several of those ecological SSLs are lower values than the soil to air SSLs now presented in this table.
- c) Please clarify the relevance of Footnote 8 for iron.
- p. 71, §16 Please correct the delivery due date.
- p. 74, WS 17 The last paragraph states that soil samples will be analyzed for PCBs and metals. Table 17-1 also includes TPH. Please edit the text to be consistent with Table 17-1.
- p. 75, Table 17-1 Please confirm that GZ-318 is the well proposed for sampling for Building 227, or provide the correct well. Previously, Appendices C and E indicated that well GZ-328 will be sampled. These appendices were not resubmitted with this Draft Final Revised SAP to determine if this was corrected.
- p. 76, WS 18 a) Please correct the boring depth for AOC 001 to "2 feet to top of bedrock."
- b) A dioxin groundwater sample should be collected and analyzed if dioxins are detected in the soil samples.
- p. 78, WS 19 Dioxins need to be collected for groundwater samples at AOC 001, as noted in other comments, so delete "rinsate blanks only" for dioxin analysis of groundwater.
- p. 80, WS 20 Correct the number of dioxin sediment sample locations to 9 to correspond with Table 17-1.
- Figure 3 This figure is significantly different from Figure 3 in the draft version of this SAP. Please clarify what actions the Navy has taken since the draft SAP was submitted that support such revisions. Please comment on the accuracy of this figure relative to the actual field conditions/feature locations.
- Figure 4 Based on the estimated groundwater contours shown in Figure 2 and to get a better

areal coverage with the groundwater monitoring wells, MW-01 should be relocated to the southeast approximately 25 feet to the southeast. Please edit this figure accordingly.

The following comments were made previously on the SAP appendices, but the appendices for the draft final revised SAP were not resubmitted so EPA could not determine if these comments were addressed:

Appendix C, §3.0 In the third bullet of the first paragraph, GZ-328 is identified as the well to be sampled at Building 227. Table 17-1 in the SAP identifies GZ-318 as the well to be sampled at Building 227. Please clarify.

Appendix E Well logs are provided for GZ-301, GZ-314, and GZ-328. If GZ-328 is not the well to be sampled for Building 227, please add the well log for the well that will be sampled.

