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LETTER REGARDING U S EPA REGION I COMMENTS ON THE DRAFT TIER II SAMPLING
AND ANALYSIS PLAN FOR DECISION UNIT 1-1 AND DECISION UNIT 1-3 SITE 7 TANK
FARM 1 OPERABLE UNIT 13 (OU 13) NS NEWPORT RI
9/4/2015
U S EPA REGION I



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION I

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

4 September 2015

Mr. James Gravette Remedial Project Manager
Environmental Restoration NAVFAC MIDLANT OPNEEV
9324 Virginia Avenue
Building Z-140
Norfolk VA 23511-3095

RE: EPA review of draft Tier II Sampling and Analysis Plan Decision Units 1-1 and 1-3 at Tank Farm 1 (Site 7) Operable Unit 13 Naval Station Newport Portsmouth, Rhode Island

Dear Mr. Gravette:

EPA has reviewed the *Draft Tier II Sampling and Analysis Plan, Decision Units 1-1 and 1-3 at Tank Farm 1 (Site 7), Operable Unit 13*, at Naval Station Newport, Portsmouth, Rhode Island, dated July 24, 2015 (referred to as the SAP). The document was prepared by Resolution Consultants for the Naval Facilities Engineering Command Mid-Atlantic. The SAP supports a pre-design investigation (PDI) to refine the extent of surface soil impacts that exceed preliminary remedial goals. The SAP presents the sampling plan and rationale; the analytical methods and performance criteria; standard operating procedures for field work; and laboratory certifications.

The document was reviewed for completeness, technical accuracy, and consistency. General and specific comments on the referenced document are attached.

Please don't hesitate to contact me at (617) 918-1272 if you have any questions.

Sincerely,

Jane Dolan
Remedial Project Manager
Federal Facilities Superfund Section

Cc: P. Crump/RIDEM
G. Kemp/Mabbett

**EPA COMMENTS ON DRAFT TIER II SAMPLING AND ANALYSIS PLAN DECISION
UNITES 1-1 AND 1-3 AT TANK FARM 1 (SITE 7) OPERABLE UNIT 13 NAVAL
STATION NEWPORT PORTSMOUTH, RHODE ISLAND**

GENERAL COMMENTS

- 1) According to the Data Gaps Assessment Report surface soil samples at the transformer vaults were all collected from the 0-1 foot depth interval; therefore, it will not be appropriate to collect PDI soil samples from the 0-2 foot depth interval at DU 1-3 because the PDI samples would be diluted as compared to the data gaps assessment samples so direct comparisons would not be possible. Because Navy intends to excavate the top two feet of soil, and because none of the data gaps investigation samples from the 2-4 foot depth interval had exceedances of the preliminary remedial goal, sampling deeper than 0-1 foot is not necessary or appropriate.

Similarly, most of the surface soil samples collected at the ethyl blending plant during the data gaps assessment were collected from the 0-1 foot depth interval; therefore, it will not be appropriate to collect PDI soil samples from the 0-2 foot depth interval. Samples should be collected from the 0-1 foot interval so samples will be consistent with the data gaps samples. Because Navy intends to excavate the top two feet of soil, and because none of the data gaps investigation subsurface samples had exceedances of the preliminary remedial goals, sampling deeper than 0-1 foot is not necessary or appropriate.

- 2) Please plan to collect GPS coordinates for the four corners of transformer vault 3 before collecting PDI samples and verify that the proposed sample locations are reasonable based on the corners of the vault relative to the proposed sample locations. Have the land surveyor survey the four corners of the building when the sample locations are surveyed so the location of the samples relative to the building will be established.

SPECIFIC COMMENTS

- 1) Pg v, par 1 – Please revise the description of the DUs to be consistent with the explanation recently provided in the Feasibility Study for DU 1-1, 1-2, and 1-3, dated August 14, 2015.
- 2) Pg WS 9-1 – EPA does not recall a resolution at the meeting where the PDI SAP would be prepared using the traditional approach of discrete samples. Nevertheless, in order to move this one particular project forward, EPA agrees to the collection of discrete samples. In the future, the more representative approach of collecting samples by the MIS method should be instituted.
- 3) Pg WS 10-4 – Please supplement this section with a summary of the previous investigations conducted at DU 1-2, including a figure. EPA requests that one sample be collected due north of SB1028 (1,000 µg/kg PCB) and east of SB1021 to verify the down gradient extent of PCBs associated with sample EV2-E (24,000 µg/kg).
- 4) Pg WS 18-3 – Regarding QC samples, for consistency and clarity include Xs for all analytes. Similarly, “contingency TBD⁵” should be included for each analyte.

- 5) Table 1 – In the future it would be helpful if the shading presented in this table matched the shading presented on the figures which designate exceedances.
- 6) WS-11-1, par 3 – Please revise this paragraph to remove statements that alternative S-2 from the FS report is the Navy’s preferred remedial alternative. The proposed plan has not yet been subject to public comment. Simply state that additional delineation is required to bound the exceedances. Please update the references in the Spatial Boundaries section on page 11-3 as necessary.
- 7) Pg WS 11-8, par 1 – Please describe how the lab will homogenize the sample.
- 8) Table 4 – The rationale for step-out samples 214 to 221 needs to be edited to read “... to determine limits of targeted excavation or LUC boundary.”
- 9) Pg WS 17-1, second bullet – Please explain why the CSM needs to be refined.
- 10) Pg WS 17-3, par 1 – There does not appear to be a worksheet #15. Please clarify.
- 11) Figure 3 – Please shift PDI samples 111 and 112 counterclockwise so 111 is directly down gradient of SB1024. Move 211 to be down gradient of relocated 111.
- 12) Figure 4 – All the sample locations shown in this figure appear to be located farther southeast than shown in the Data Gaps Assessment Report. For example, sample SB1026 was collected directly outside the door and SB1027 was stepped out in alignment with the door. Sample SB1032 was collected near the corner of the building just down gradient of the rectifier (at or very near the proposed location shown for PDI sample 122). Sample SB1033 was collected down gradient of SB1032 as a step-out location (not around the corner from the rectifier). Please refer to Appendix A of the Data Gaps Assessment Report for field documentation of sample locations. Navy should obtain GPS coordinates from Tetra Tech for SB1032 and SB1033 and review and verify all sample locations shown on this figure. It will be necessary to capture the location of the four corners of the building to ensure that sample locations are located correctly relative to the building. PDI sample locations should be adjusted as necessary. It is expected that the limits of soil excavation will extend to clean samples, so place PDI samples accordingly.
- 13) Figure 4 – EPA requests that the PDI sampling encompass sample SB1033 because the presence of Aroclor 1254 at this location and not at SB1032 suggests the probability of a separate release/discharge. PDI sampling should determine the extent of Aroclor 1254 in a down gradient location. Should down gradient sampling produce acceptable results, sample location SB1033 may be determined to be suitable for establishing the limit of excavation. (Note that Figure 4-6 of the DGA Report has transposed the results for SB1033 and SB1032.)
- 14) Figure 4 – As placed, the initial refinement samples leave a data gap east-northeast of SB1027; therefore, the extent of excavation is not limited in that direction until step-out sample 230. Add another initial refinement sample in that direction to better constrict the limit of excavation.