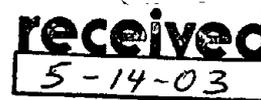




TETRA TECH NUS, INC.



C-NAVY-05-03-1620W

May 13, 2003

Project Number N5152

Mr. Franco LaGreca
Head, New England Restoration Management Branch
EFA Northeast, Naval Facilities Engineering Command
10 Industrial Highway, Mail Stop 82
Lester, Pennsylvania 19113

Reference: CLEAN Contract No. N62467-94-D-0888
Contract Task Order No. 0842

Subject: Response to Comments,
Draft Work Plan for Groundwater Monitoring, Former Melville North Landfill
Portsmouth Rhode Island

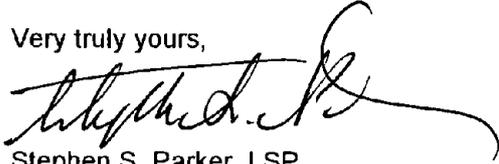
Dear Mr. LaGreca.

This letter serves as transmittal of responses to comments from the Rhode Island Department of Environmental Management (RIDEM) on the subject document. Comments were received on May 12, 2003. These comments and the Navy's responses are provided on Attachment A.

The Navy concurs with the comments from RIDEM as described on Attachment A. A revised work plan is under preparation and will be issued prior to commencement of field activities. The Navy intends to move forward with well installation and sampling as soon as an access agreement can be arranged with the property owner.

If you have any questions regarding this material, please do not hesitate to contact me.

Very truly yours,


Stephen S. Parker, LSP
Project Manager

SSP/rp

Attachment

c: P. Kulpa, RIDEM (4 - w/encl)
C. Mueller, NSN (2 - w/encl)
J. Trepanowski/G. Glenn, TtNUS (1 - w/encl.)
File N5152-3.2 (w/o encl.), N5152-8.0 (1 - w/encl.)

ATTACHMENT A
RESPONSES TO COMMENTS ON THE
WORK PLAN FOR GROUNDWATER MONITORING
FORMER MELVILLE NORTH LANDFILL
PORTSMOUTH, RHODE ISLAND
Comments Dated May 8, 2003, Received May 12, 2003

1. Section 3.1, Well Installation
Page 3-1.

This section of the report deals with the installation of the monitoring wells at the site. Please add the following stipulations to this section of the report:

Soil samples will be taken from the borings if there is field evidence of contamination, (i.e. stained soil, petroleum odors, product, etc).

Contamination observed during installation of the well will be documented.

In order to meet the requirements of the State's Groundwater Regulations the well screen and filter pack must be size for the geological conditions at the site. To insure that these conditions are met the Navy will either submit the appropriate geological information, and the calculations in the work plan documenting that the filter pack and screen are correctly sized or require that the well driller have various filter pack and well screens available at the site during well installation.

Wells will be screened across the water table. If contamination is observed at deeper depths additional wells may have to be installed.

Remove the maximum time limit on well development.

Response: The Navy concurs with the approaches stated in the comment above. Section 3.1 will be revised to reflect collection of soil samples for TPH analysis if any visual or olfactory evidence is encountered that would indicate contaminant presence. Documentation of observations for contaminants present through use of boring logs will be clarified. Availability of different size filter pack and well screens for use as appropriate for the formation will be required. Additional wells will be installed if contamination is observed at deeper depths. Wells will be purged until measurement parameters cited stabilize.

2. Section 3.2, Groundwater Sampling
Page 3-1.

The report proposes collecting groundwater samples utilizing low flow methods. Initial groundwater samples must be collected using standard purging techniques and a bailer. Additional or subsequent samples may be collected using the low flow technique.

Response: Current technical guidance and industry standards demonstrate that low flow sample collection provides data which is more representative of groundwater flowing through a formation. Bailing typically artificially elevates turbidity resulting in upwardly skewed metals levels as well as elevated PAHs (if present) that are associated with sediment particles. Bailing may also cause a decrease in VOC levels due to increased agitation as compared with low flow methods. However, in order to satisfy RIDEMs request, the Navy will collect water samples with both low flow and bailing methods to assure that decisions are considered based on the best available data.

**3. Section 3.2, Groundwater Sampling
Page 3-2.**

The report states that an oil/water interface probe will be use to detect NAPLs. The report must stipulate that, prior to purging, a sample of NAPLs will be collected if present.

Response: The Navy concurs and samples of NAPLs will be collected using bailers if any measurable layer is found.

**4. Section 3.3, Investigation Derived Waste Management
Page 3-6.**

The report states that a license disposal contractor will be employed in order to dispose of investigation derived well waste. Please be advised that DEM IDW policy does allow water generated during the installation or testing of a well to be disposed of on site if it is not contaminated. This also applies to soils from the drilling process.

Response: The Navy concurs, and may opt for on-site disposal if conditions allow, with the permission from the landowner.

**5. Section 3.4, Well Abandonment Removal Groundwater Sampling
Page 3-6.**

The report states that the wells will be removed in their entirety after the wells have been sample. The report is a public document and the above may be misinterpreted to mean that the wells will be removed after one sampling round. Since multiple rounds of sampling may be required at this site this section of the report should clearly stated that the wells will not be removed until groundwater monitoring program is completed and an approval has been obtained from the DEM for the removal of the wells.

Response: The Navy concurs and this will be clarified.

**6. Section 4.1, Problem Definition/Background
Page 4-1.**

The report states that analytical results will be compared to DEM's GB standards. The GB groundwater objectives are designed to address volatilization into basements. These standards do not address other exposure pathways or discharges into wetlands or other sensitive environments. Therefore, this section of the report should be modified as follows:

Sample analytical results will be evaluated to determine whether the site is affecting human health or the environment, as well as, exceeding any groundwater standards or requirements.

Response: The Navy proposed the approach stated in the work plan to comply with RIDEM Remediation Regulations Section 8.10(B), Compliance with the Groundwater Objectives. The groundwater objective that was used for this site during site investigation and cleanup activity conducted under RIDEM oversight during the period of 1997-2000 was GB.

Therefore, for comparison purposes, the site data will initially be compared with GB groundwater criteria. The Navy is open to discussion with RIDEM on the applicability of other criteria (ecological and human health) that are appropriate for this site.