



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

July 1, 2005

Curt Frye
US Department of the Navy, Northern Division
Code 1823, Mail Stop # 82
10 Industrial Highway
Lester, PA 19113-2090

RE: Post Removal Groundwater Evaluation Report, Melville North Landfill Naval Station
Newport, Portsmouth, Rhode Island

Dear Mr. Frye;

The Rhode Island Department of Environmental Management, Office of Waste Management has reviewed the Post Removal Groundwater Evaluation Report; Melville North Landfill dated 28 October 2004.

The latest removal action for the site was completed in May 2000. As the Navy is aware, groundwater contamination, including free product, was also present at the site. The remedial action was designed such that removal of the source would also result in the eventual remediation of the groundwater. In order to demonstrate that this has occurred the Navy installed three monitoring wells at the site and initiated a groundwater monitoring program.

The first round of sampling was conducted in August of 2003. In this round (low water table), LNAPLs and/or petroleum odors were detected in the monitoring wells. In addition, TPH was detected in one of the wells and elevated levels of metals were detected in the bailed samples. These compounds were not detected, and/or detected at low concentrations in the second sampling round collected in April 2004 (high water table).

The third round of sampling was completed in August of 2004 (low water table). In this round LNAPLs and/or petroleum odors were observed and TPH was detected. A trace amount of tetrachlorethene was also found.

The information gathered to date indicates that the site is not in compliance. It is the Navy's responsibility to ensure that the groundwater at the site is in compliance with all regulations, including, but not limited to, the Site Remediation Regulations and the Oil Pollution Control Regulations. In order to demonstrate compliance the following conditions must be met.

- 1) Seasonal fluctuations and their effect on contaminant concentrations, must be evaluated (typically entails the collection of samples in all four seasons)

1626

- 2) Once seasonal fluctuations have been investigated, subsequent groundwater samples will be biased toward the season(s), which exhibit the highest concentration of contaminants. If seasonal fluctuations are not evident, subsequent sampling will be such that each season is represented.
- 3) The Navy may petition the Department to terminate groundwater monitoring once four consecutive rounds of groundwater samples, taken as described in 2 above, are obtained which produce data showing that,
 - a) the concentration of all contaminants are below the site-specific remediation goals;
 - b) contaminant concentrations are not increasing and
 - c) free product is not present,
- 4) Since a removal action has been conducted at the site, if it is demonstrated to the satisfaction of the Office of Waste Management that natural attenuation is occurring the Navy may petition to change the sampling frequency.

Please be advised that if conditions do not improve the Navy may have to actively remediate the groundwater. Also, at any time during the monitoring program the Navy may propose active remediation.

If the Navy has any questions or requires additional information please call this Office at (401) 222-2797 ext.7111.

Sincerely,



Paul Kulpa,
Project Manager

cc. M. DeStefano, DEM OWM
R. Gottlieb, DEM OWM
C. Mueller, NETC