



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

May 25, 1993

Francisco La Greca
U.S. Department of the Navy
Northern Division
10 Industrial Highway
Code 1823, Mail Stop 82
Lester, PA 19113-2090

received
6-1-93

RE: Evaluation of the Navy's Response to Comments on the Soil Investigation Tank Farm Five - Tanks 53 and 56, Draft Report, Naval Education and Training Center, April 30, 1993.

Dear Mr. La Greca:

Attached you will find a copy of EPA's evaluation of the Navy's Response to Comments on the recent soil investigation within the area of tanks 53 and 56 of tank farm five. EPA's original comments consisted of both general and specific comments; this evaluation references the original numbered comments.

In order to ensure that the "Soil Investigation Tank Farm Five - Tanks 53 and 56" report is a comprehensive summary of the correspondence between EPA and the Navy, you should ensure that the final text of the report is revised to reflect any changes specified in the correspondence. The first section of the attachment specifies some of the responses to comments which should be incorporated into the language of the final report.

The second section of the attachment, which references the original comments from EPA's letter to the Navy on the draft report, dated March 12, 1993, identifies EPA's concerns with the Navy's responses to comments. The Navy should review these outstanding comments and revise the final text accordingly. Upon incorporation of the attached comments, EPA concurs with the draft final document as submitted.

If there are any questions with these comments, you should feel free to call me at 617/573-9614.

Sincerely,

A handwritten signature in cursive script, appearing to read "Andrew F. Miniuks".

Andrew F. Miniuks, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc. Greg Fine, RI DEM
Paul Kulpa, RI DEM
Mike Kulbresh, CDM



Attachment A

Incorporation of Navy's Responses to
Comments in Final Report Text

3. Section 2.3.2, Page 2-5, top of page

Provide the date when well GHR was installed. Section 2.3.1, page 2-4 of this report indicates the installation dates for wells MW-86-3S and -3D, and does not list the installation date for well GHR.

16. Section 4.3.3, Page 4-6, 1st ¶

Revise this section, if appropriate, that the data validation wasn't performed in accordance with the Region I Data Validation Functional Guidelines for Organic and Inorganic analyses.

22. Section 4.4.1, Page 4-11, 1st full ¶

Revise this section of the report to include a specific description of whether or the contaminated soil in the vicinity of B-20 was accounted for in the 2,400 cubic yards.

Additional Clarification/Text Modification Required

13. Section 3.3, Page 3-5, 3rd ¶

Based on the third sentence of this paragraph, it appears that samples were first analyzed for Total Petroleum Hydrocarbons (TPH), and after receiving the analytical results, the Navy sent the samples from these borings for TCL VOC analyses.

Clarify whether or not this is an accurate description of the sampling and analyses of these samples. In addition, describe if the samples selected for the TPH and TCL VOCs analysis were based on elevated FID readings.

Describe the methods used to quantify the concentrations of TPH in the field as indicated by the sentence "...TPH values (above 100 mg/Kg)...".

Revise the workplan to include the statement that the samples selected for TCLP analysis were obtained from discrete intervals and have not been composited.

EPA's Evaluation of the Navy's Response to Comments

EPA recommends that the Navy incorporate into the final report language which indicates that analytical data for the Total Petroleum Hydrocarbon (TPH) was available to the Navy prior to selecting which samples were to be analyzed for Volatile Organic Compounds (VOCs) analysis.

In addition, the Navy should clearly indicate in the final text, that the samples potentially analyzed for VOCs were submitted concurrently with the TPH samples.

14. Section 3.3, Page 3-6, 2nd ¶

Revise the legend of Table 1 to include an explanation of how to interpret the "Sample Number."

The duplicate sample collected from Background Sample, Boring 50 (TF5-B504-1014) was analyzed only for TCLP. Therefore, this sample can not be a duplicate of sample TF5-B501-1014, since this sample was not analyzed for TCLP.

Revise this apparent discrepancy.

EPA's Evaluation of the Navy's Response to Comments

EPA does not agree with the Navy's response regarding the definition of "duplicate" in regards to this comment. More specifically, EPA does not agree that samples TF5-B501-1014 and TF5-B504-1014 are field duplicates, since they were not analyzed by the same analytical method. Sample TF5-B501-1014 was analyzed for VOCs, BNAs, pesticides/PCBs and metals, while TF5-B504-1014 was analyzed for TCLP. These methods are not equivalent.

Revise the final text to delete references to these samples as duplicates.

26. Section 5.2.2, Page 5-4, 1st ¶

Clarify this section of the report which describes why only 2400 cubic yards (cy) of contaminated soil will be land-filled when 3000 cubic yards of soil is being excavated. Similarly, why is 2400 cy of clean soil being backfilled when 3000 cy is being excavated?

EPA believes that the Navy should revise the text to clearly state that "if the top six feet of soil is deemed to be clean, then an additional 2400 cubic yards of clean fill will be required for backfill."