

Management and Monitoring Approach

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November 2011

Why Develop this Approach?



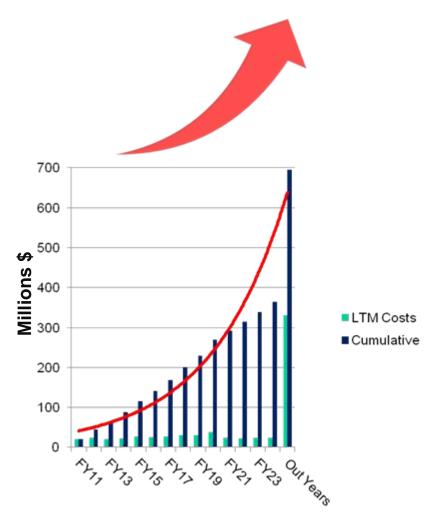
Long Term Management Costs

Power in Decision Making

- Consistent High Quality Information
- Transparency Promotes Understanding
- Document Sampling Strategy and Methods
- Site Closure Requirements

Smart Tool

- Tells the Story of the Site
- Captures Past Actions and Agreements
- Reinforces Exit Strategy



Source: NAVFAC NORM Database Spring 2011

Introduction



DECLARATION



Introduction

This Remedial Action Operations and Long-Term Monitoring (LTM) Report presents the Y (Round 16) groundwater and ecological monitoring activities completed at Site 1, Landfill at (House Creek for Naval Radio Transmitting Facility (NRTF) Driver, located in Suffolk, Virginia facility). The LTM at Site 1 is required in accordance with the selected remedy identified in the Record of Decision (ROD) signed in September 1997. This Remedial Action Operations and report was prepared by the Naval Facilities Engineering Command (NAVFAC) for submittal to Navy and the Virginia Department of Environmental Quality (VDEQ).

1.1 Objective

The LTM being conducted at Site 1 evaluates whether contamination has migrated outside the lan boundary and if the selected remedy-Institutional Controls (ICs) (site restrictions with LTM remains protective of human health and the environment.

The objectives of this report are to:

- Present the results for Round 16 of Site 1's LTM Program
- Evaluate these results through trend analysis of all 16 rounds of data collected over the pas
- Better define metrics used to evaluate whether Remedial Action Objectives (RAOs) have been met at the site
- Present an exit strategy for LTM at Site 1 and describe the site's progress toward closure

1.2 Organization

The LTM Report is organized as follows:

Section 1 - Introduction

Section 2 - Site Background

Site Name and Location

Site 1, Landfill at Oyster House Creek Naval Radio Transmitting Facility Driver Suffolk, Virginia

This decision document presents the selected remedy for Site 1, Radio Transmitting Facility (NRTF) Driver that was chosen in accordance with the Comprehensive Environmental Response, Statement of Basis and Purposes Compensation and Liability Act (CERCLA) of 1980, as amended by the Superfund Amendments and Reauthorization Act (SARA), and to the extent practicable, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). This decision is based on the Administrative Record

The State of Virginia Department of Environmental Quality (DEQ) and the United States Environmental Protection Agency (USEPA) Region III support the selected remedy.

Actual or threatened releases of hazardous substances from Site 1, if not addressed by implementing Actual or unreatened releases of nazarroous substances from one 1, it not addressed by implementing the response actions selected in this Record of Decision (ROD), may present a potential threat to Assessment of the Site public health, welfare, or the environment.

The selected remedy is Remedial Action Alternative (RAA) No. 2 - Institutional Controls with Description of the Selected Remedy

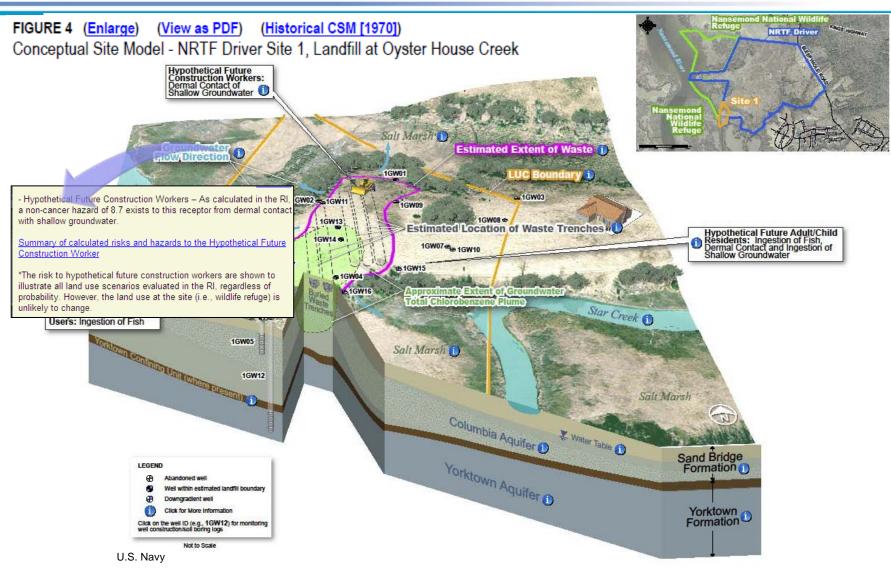
Under the Institutional Controls with Long-Term Monitoring Alternative, institutional controls in Onder the institutional Controls with Long-Term Monitoring Alternative, institutional controls in the form of site restrictions would be implemented in the vicinity of Site 1, west of monitoring well MW-01GW-03 (see Figure 4), to restrict the future disturbance and/or development of the site, and the use of the shallow aquifer. Implementation of this alternative through site restrictions would the use of the snahow adulter. Implementation of this alternative through site restrictions would eliminate exposure pathways to potential human receptors such as future potential residents of construction would be a supplied to the construction of the construction would be a supplied to the construction of the construction

Long-term monitoring would be performed to further evaluate shallow groundwater contamination Long-term monitoring would be performed to turner evaluate snanow groundwater contamination and migration. Monitoring would also be conducted to further assess potential ecological risks and and magration. Monitoring would also be conducted to further assess potential ecological risks and impacts. Long-term monitoring would involve periodic sampling of shallow groundwater, sediment, and fish. The sampling of fish will be conducted as part of a base-wide ecological monitoring and itsi. The sampling of itsi will be conducted as part of a base-wide ecological monitoring program. A Long-Term Monitoring Program (LTMP) Work Plan will be prepared as part of the program. A Long-term monnoring rrogram (LIMF) work rian will be prepared as part of the design phase of this remedial action. The LTMP Work Plan also will include the following postuesign phase of this remedial action. The LTMF WORK rian also will include the following post-closure plans: an inspection plan; a preparedness and prevention plan; and a contingency/emergency procedures plan.

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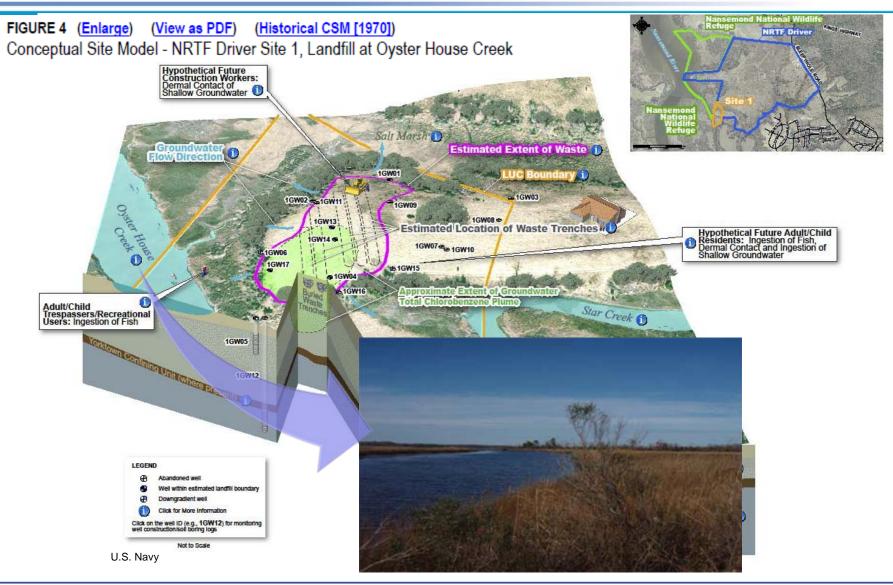
Conceptual Site Model





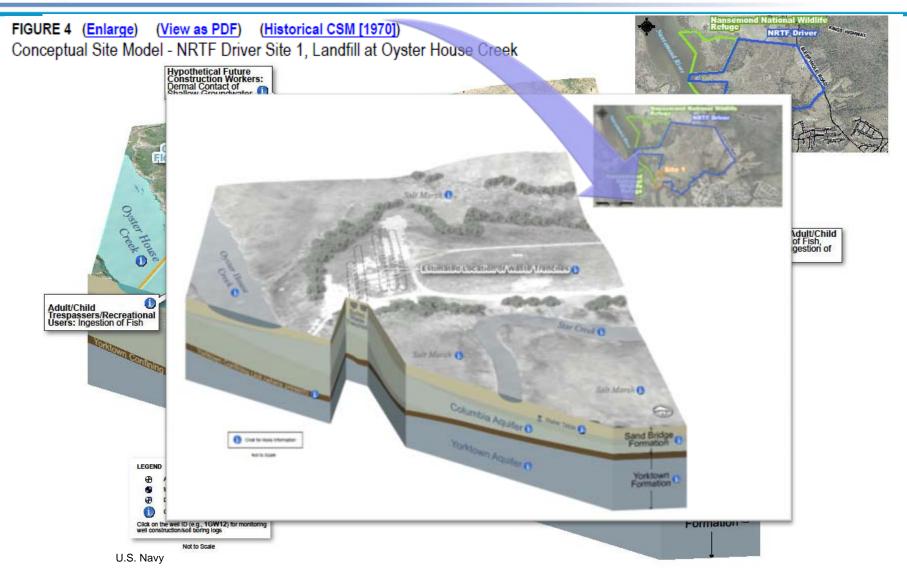
Conceptual Site Model





Conceptual Site Model





Previous Investigations and Decisions



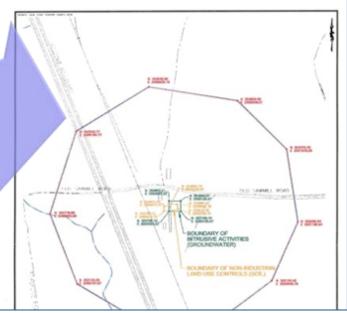
4. SITE 3 LTM

TABLE 4-1

Site 3 - Previous Investigations and Remedial Actions

Site 3 - Previous Investigations and Remedial Actions				
Pre-ROD Previous Investigation	Date	Activities	Admin. Record No.	
Remedial Investigation (RI) (Baker)	1996	Evaluated the nature and extent of contamination. VOCs (particularly fuel constituents) and SVOCs (primarily PAHs) were detected in groundwater within the surficial and Castle Hayne aquifers. SVOCs were identified in both the surface and subsurface soil, particularly within the creosote treatment area. The human health risk assessment (HHRA) identified potential risks to future residential children and adults due to exposure to the following SVOCs in groundwater: benzo(a)pyrene, benzo(a)anthracene, dibenzofuran, phenanthrene, and acenapthalene.	001699 and 001700	
FS (Baker)	1996	Following an evaluation of remedial alternatives for both soil and groundwater, the following two-part alternative was selected: Source removal with onsite biological treatment of PAH-contaminated subsurface soils. Monitored natural attenuation (MNA) with LUCs for groundwater.	001721	
ROD (Baker)	1997	Established Remedial Action Objectives (RAOs) and defined the selected remedy. The RAOs were: - Prevent leaching of PAH contaminants from subsurface soil to the groundwater. - Remediate subsurface soil and shallow groundwater. - Prevent exposure to contaminated groundwater.	001753	

Prevent exposure to contaminated groundwater.				
Post-ROD Previous Investigations	Date	Activities	Admin Record No.	
LTM	1998	LTM monitoring begins.	NA	
Treatability Study (Baker)	1998	Biological treatment of PAH-contaminated subsurface soil was tested. The study indicated that biological treatment was not effective.	NA	
Amended ROD (DoN)	2000	Based on the results of the 1998 Treatability Study, the remedy was amended to remove biological treatment of soils. Soil excavation with offsite disposal was chosen to address source removal at this site.	NA	
Non-Time Critical Removal Action (NTCRA) (Shaw)	2000	Approximately 3,295 tons of PAH-contaminated soil was removed from Site 3 and disposed of offsite.	NA	
Land-Use Control Implementation Plan (LUCIP) (DoN)	2001	The LUC objectives are to: Prohibit intrusive activities that could potentially expose workers to impacted groundwater. Prohibit the withdrawal and any use of contaminated groundwater, except for environmental monitoring, for the aquifers within 1,000 ft of the estimated extent of impacted groundwater.	NA	
LTM Optimization Update	2009	Site 3 LTM program determined sufficient to meet objectives.	NA	
Current LTM Activities	2010	Annual groundwater sampling from four monitoring wells for VOC and SVOC analyses were increased to quarterly sampling for one year to reassess the site for possible closeout.	NA	



2009 LONG-TERM MONITORING OPTIMIZATION UPDATE

OU 12 (Site 3)

Site 3, Old Creosote Plant, is located on the main side portion of MCB CamLej, approximately 1 mile north of Wallace Creek along Holcomb Boulevard. Site 3 encompasses approximately 5 acres, is generally flat, and is intersected by a dirt access road.

Currently, four wells are being sampled annually for VOCs and semivolatile organic compounds (SVOCs) utilizing low-flow sampling techniques. Included in the sampling are three shallow wells and one intermediate well.

Within OU 12, Site 3 is included as part of the LTM Program. The groundwater flow direction is generally northeast towards the receptor Wallace Creek, and NCGWQS estreedistices from the August 2008 LTM Sampling event are shown on Figure 11.

Site 3 sampling currently utilizes low-flow sampling techniques. Deploying a PDB would greatly reduce the LTM Program effort at this site; however, since SVOCs require monitoring at the site and sampling procedures of SVOCs require a significant volume to be sampled, low-flow sampling techniques must continue to be employed at Site 3 as long as SVOCs are monitored.

Site 3 Recommendations Summary

The LTM program is determined to be sufficient and therefore there are no optimization recommendations for Site 3 under the LTM Program.

Remedy Implementation and Evaluation



Remedial Action Objectives

The Site 1 ROD (

- Prevent future
- Prevent future

The LTM approa and fish. Sixteen and 14), and five date. Sediment Name Creeks. 2004) to modify than 100 for all of recommended of current LTM appr

The Work Plan d specific applicable and established (MCLs) and the to surface water. based on analytic target endpoints Water Quality Sta Screening Values of inconsistencies described in deta

TABLE 3 Summary of Remedial Action Objectives - NRTF Driver Site 1, Landfill at Oyster House Creek

-	*		
Risk	RAO	Remedy Comp	ponent
Landfill materials	Prevent future potential exposure to landfill materials	LUCs (site restrictions on intrusive activities, land use and	
		development)	TA Su
SVOCs in shallow groundwater	Prevent future potential exposure to contaminated shallow groundwater and monitor plume migration	LTM for shallo groundwater	Оу
			C
		LUCs (site res prohibit withdra groundwater a residential use	Arc
			1,2
			1,4
PCBs in fish	Prevent future potential exposure to	LTM for fish tis	1,2 Tric
	contaminated fish tissue		2,4

TABLE 2

ponent

Summary of Cleanup Levels – NRTF Driver Site 1, Landfill at Oyster House Creek

Expected Outcome

Current land use (landfill with

vegetative soil cover)

	Cleanup Level		
Contaminant of Concern	Groundwater (µg/L)	Fish Tissue (µg/kg)	
Aroclor-1260	0.5	50	
1,2-Dichlorobenzene	600	N/A	
1,4-Dichlorobenzene	75	N/A	
1,2,4- Trichlorobenzene	70	N/A	
2,4,6- Trichlorophenol	6.1*	N/A	

^{*} Groundwater cleanup level is the RSL since no MCL is available

μg/L = micrograms per liter µg/kg = micrograms per kilogram

Metric/Cleanup Level

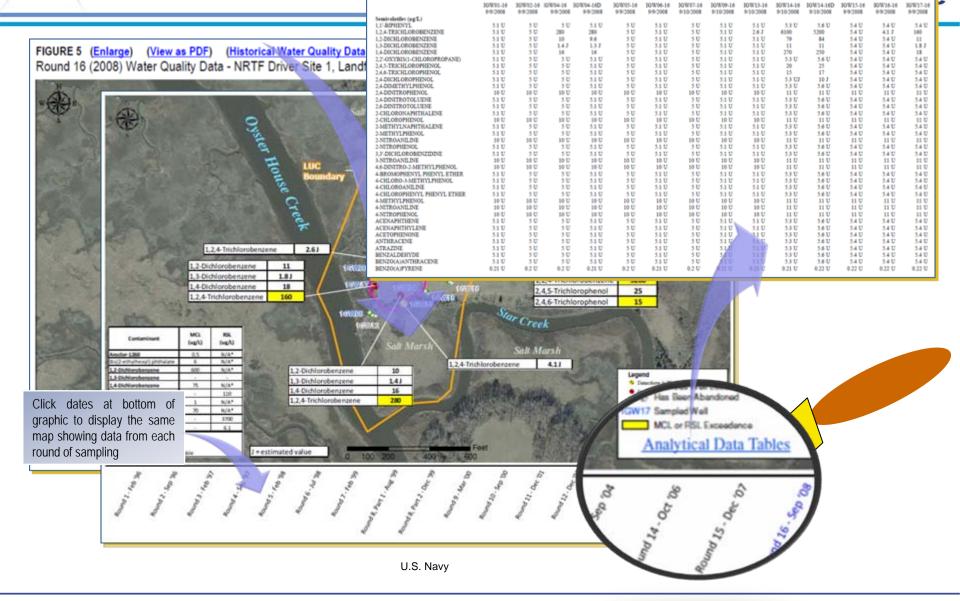
Maintain LUCs into

foreseeable future and

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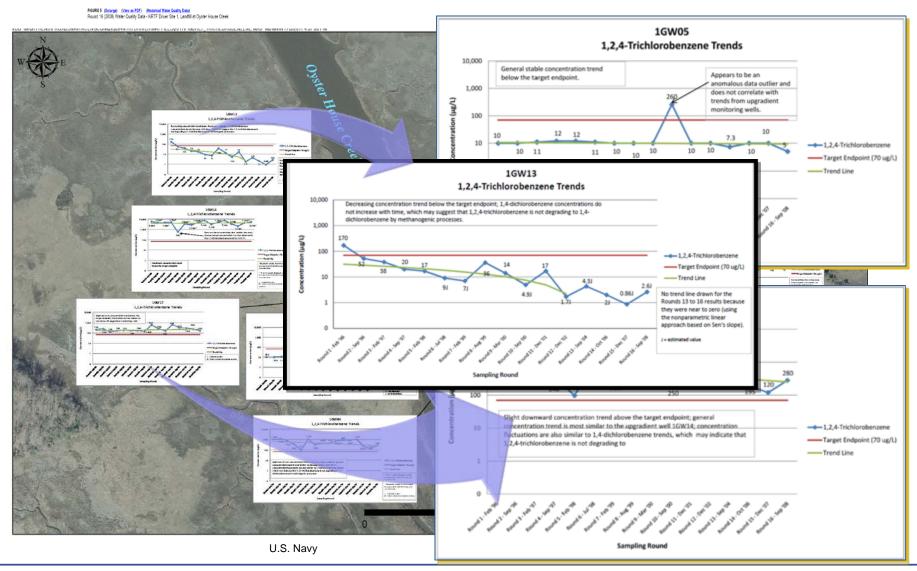
Monitoring Pr

APPENDIX A.1 GROUNDWATER SAMPLES - ROUND 16 LONG-TERM MONITORING PROGRAM NRIF DRIVER SUFFOLK, VIRGINIA



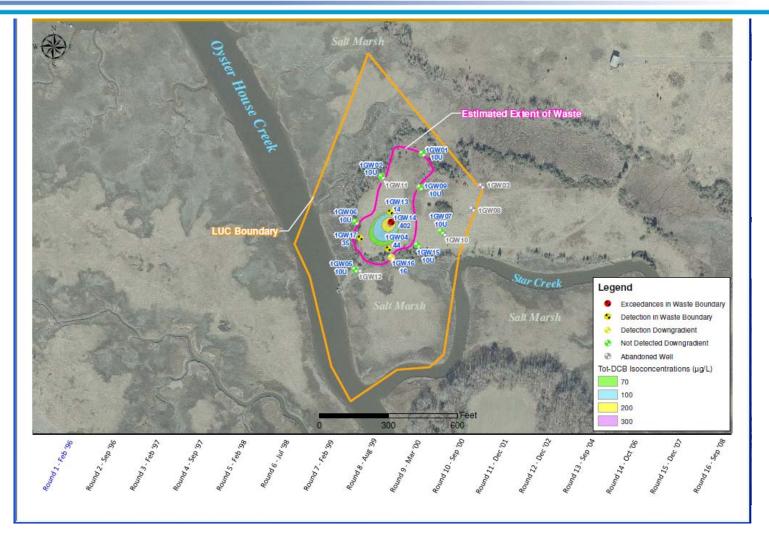
Data Evaluation: Trend Charts





Data Evaluation: Monitored Natural Attenuation

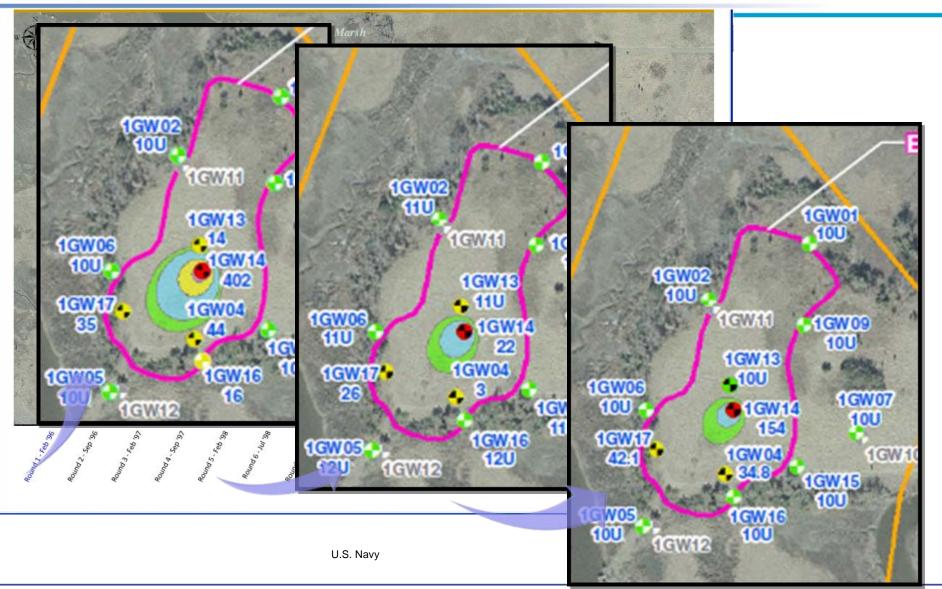




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Data Evaluation: Monitored Natural Attenuation





Evolution of Approach



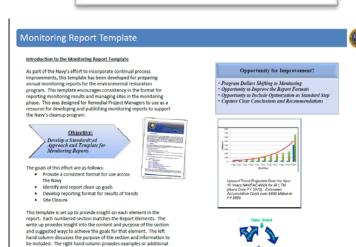
Information Shared

- Navy Remedial Project Managers February 2011
- Environmental Protection Agency March 2011
- EPA Head Quarters May 2011
- EPA Region 3 Tier III Team May 2011
- EMEC EPA and States
 - San Francisco July 2011
 - Boston August 2011
- More

Refined and Applied

- Prototype
- Other Navy Sites





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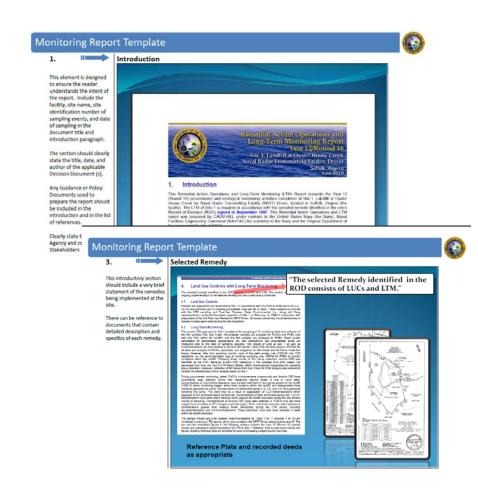
information to understand how to present the content.

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Format



- Based on ROD Toolkit
- Elements
 - Examples and guidelines
 - Not fill in the blank
- Main Body
 - Left column
 - Information recommended
 - Helpful hints
 - Right Column
 - Examples
 - Clarification for presentation



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Monitoring Report Template



BRAC Template Published

- http://www.ert2.org/T2Opt/guidance_docs.htm
- In use for sites with monitoring
- Applied Successfully

Monitoring Report Template



Report Elements

1 Introduction

- 1.1 Objective Introduces the report including the site name, facility, stakeholders, decision documents and cleanup program.
- 1.2 Table of Contents Presents the report layout to familiarize readers with content.

2 Selected Remedy

- 2.1 Remedial Action Objectives (RAOs) Restates the current RAOs developed.
- 2.2 Site Closeout Strategy Provides a clear path to allow for completion of efforts at the site and reduces the possibility of straying from the agreed to path forward. This section should identify any interim goals, final goals and status of effort to meet those goals.

3 Monitoring Program

- 3.1 Monitoring Objectives Data Quality Objectives- Provides clearly stated objectives and questions that the data being gathered will answer.
- 3.2 Sample Approach Provides enough detail that the locations, constituents of concern, other parameters to be sampled, frequency, sampling procedures and methods for analysis are understood.

4 Data Evaluation

- 4.1 Sampling Results Compiles results from the current rounds of sampling and appropriate historical data. This section includes figures and tables to clearly show the results of the monitoring efforts.
- 4.2 Trend Analysis Concentrations of Constituents of Concerns Presents trends to allow reader to readily understand if the site conditions are as anticipated based on the CSM or if there are other conditions that need to be considered. It documents the status of the site to allow for understanding of where the site is on the path to closeout. Answers the question of whether the RAOs are being met or if the site is moving towards response complete.
- 4.3 Trend Analysis Costs Documents historical and current cost to allow for an understanding of the use of limited resources to meet the requirements for the site.
- 4.4 Optimization and Site Closeout Progress Documents third party and routine optimization efforts at the site and captures the history and outcome of optimization. Trend analyses are discussed to document progress towards site closeout.
- 5 Conclusions Clearly and concisely states conclusions drawn from the trend analysis.



Decision Trees
Conceptual Site Models

· Trend Charts



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Refined Approach



Review Phase

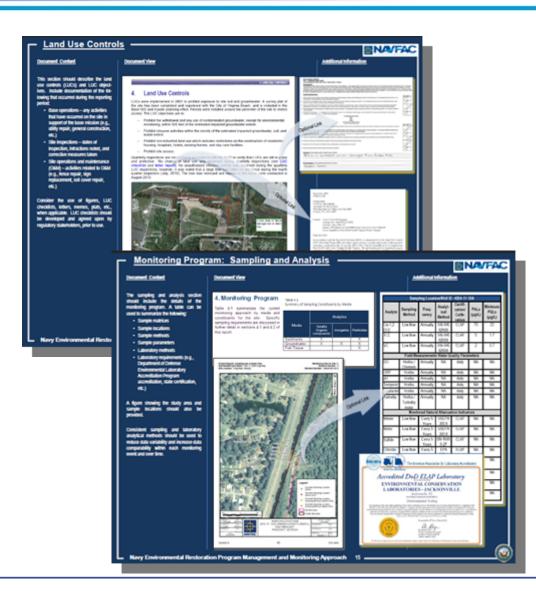


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Expanded Elements Refined Approach



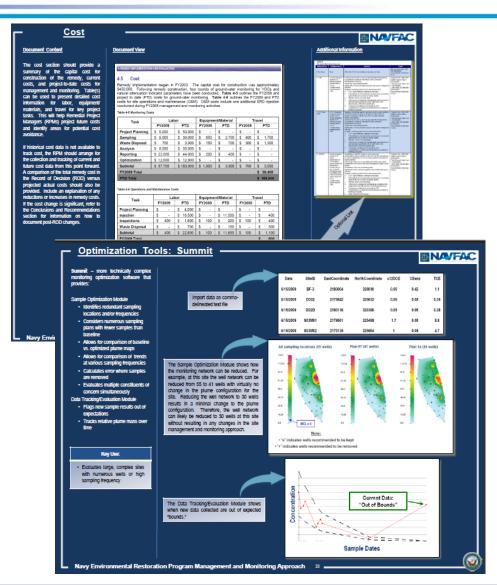
- Approach
- Executive Summary
 - Key Decisions
 - Conclusions
 - Major Site Changes
- Land Use Controls
- Monitoring Program
 - Matrices
 - Locations
 - Methods
 - Parameters
 - Lab Requirements



Expanded Elements Refined Approach



- Remedy in Place
 - Protectiveness
 - 5-Year Review Planning
- Cost
- Optimization
 - Tools
 - Documentation
- Recommendations



On the Right Road



