



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1 – NEW ENGLAND
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BOSTON, MASSACHUSETTS 02109-3912

Via Electronic Mail

July 17, 2018

Mr. Peter Britz, Environmental Planner
City of Portsmouth Planning Department
1 Junkins Avenue
Portsmouth, NH 03801

RE: Coakley Landfill Superfund Site
May 31, 2018, *Revised Draft Deep Bedrock Investigation Work Plan*

Dear Mr. Britz:

The United States Environmental Protection Agency (USEPA) is in receipt of the *Revised Draft Deep Bedrock Investigation Work Plan* (the "Revised Work Plan") submitted on May 31, 2018, by CES, Inc., on behalf of the Coakley Landfill Group (CLG) in response to USEPA's May 1, 2018, letter providing comments on the March 21, 2018, *Draft Deep Bedrock Investigation Work Plan*.

The Revised Work Plan is subject to the terms and conditions specified in the Consent Decree that was lodged in District Court on January 14, 1999 (the "Consent Decree"). Pursuant to paragraph 37(b) of the Consent Decree, USEPA, after consultation with the New Hampshire Department of Environmental Services (NHDES), approves the Work Plan subject to the following conditions:

1. Upon receipt of this letter, CES, Inc. shall submit to USEPA the sampling and analysis plan (SAP) and health and safety plan (HASP) specific for the bedrock investigation.
2. The data quality objective (DQO) as stated in Section 1.1 of the Revised Work Plan states an overall project objective. The DQOs should be evaluated for each media (in this case groundwater) and should specify how data will be collected and used, and what regulatory or screening levels the data will be compared against. This will establish which field and laboratory methods will be acceptable to attain the level of data quality needed. The DQOs can also be included in the SAP.
3. The CLG shall continue to investigate existing deep bedrock well GZ-130 from the RI that is now suspected as being used as a water supply well. Every effort shall be made to determine the owner of the well, if it is being used as a water supply and for what use, daily pumping rate, and to collect a sample from this well and analyze for PFAS and 1,4 dioxane.

4. As specified in the USEPA's May 1, 2018, letter, CLG shall update the well inventory for the Site and include all overburden and bedrock wells and all non-Site wells (residential, water supply, irrigation, etc.) that are currently or were historically monitored, and develop figures depicting the bedrock monitoring well network at the Site along with all other non-Site bedrock wells that are identified and currently or historically monitored. Along with including this information in the final report for the bedrock investigation, any data from these wells shall be considered, along with new data generated for this investigation, in the development of the deep bedrock conceptual model and for recommending any additional bedrock wells.
5. The reconnaissance of the utility corridor and golf course property shall identify and locate all bedrock outcrops, and shall map the most significant outcrops and consider this data in the development of the conceptual model for deep bedrock.
6. The data collected from the surveying and sampling of new and existing bedrock boreholes, as detailed in the Revised Work Plan, shall be used to develop a pumping test to determine fracture connectivity.
7. Data included in Table 2 from the March 21, 2018, *Draft Deep Bedrock Investigation Work Plan* appears to not correlate with data included in Table 2 of the Revised Work Plan. For example, Table 2 from the March 21, 2018, *Draft Deep Bedrock Investigation Work Plan* specifies the screen interval for MW-6 as 25 - 184 feet below ground surface (bgs), while Table 2 of the Revised Work Plan specifies the screen interval for MW-6 as 74 - 6 feet above mean sea level (amsl). In addition, Table 2 from the Revised Work Plan does not include data related to the well's construction, such as well diameter, constructed depth and measured depth.

If you have any questions or comments regarding this letter, you can contact me at (617) 918-1882 or Hull.Richard@epa.gov.

Sincerely,



Richard W. Hull, Remedial Project Manager
New Hampshire and Rhode Island Superfund Program

cc: Andrew Hoffman, NHDES
William Brandon, USEPA
Jim Murphy, USEPA
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Michael Deyling, CES, Inc.
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