



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

December 18, 1990



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Ms. Adrienne Townsell
c/o Commanding Officer
Northern Division
Naval Facilities Engineering Command
Building 77-L, U.S. Naval Base
Philadelphia, PA 19112-5094

Subject: Comments on the "Final Plan of Action - Installation Restoration Study Naval Submarine Base-New London Groton, Connecticut, prepared by Atlantic Environmental Services, Inc., April 1989.

Dear Ms. Townsell:

A review of the above referenced document has been completed by the DEP Site Remediation & Closure Division. EPA has addressed most of our concerns regarding RI/FS activities at the Groton Naval Submarine Base, as noted in Paul Marchessault's letter to you dated October 25, 1990. We offer these additional comments.

General Comments:

- 1) A section should be included in the "Final Plan of Action" explaining the sample designation system employed by Atlantic Environmental. Each site's "Summary of Proposed Samples" and corresponding site figure does not adequately explain the alphanumeric sample designation for each media sampled.
- 2) All purged water from well development must be containerized. Discharges to the ground are not allowed under the General Statutes of Connecticut. Fluids determined to be contaminated shall be disposed of in accordance with all statutory and regulatory requirements.
- 3) The Navy has applied for a dredging permit from DEP. The permit noted that dredging is proposed in the vicinity of Pier 17 (north of the Lower Base site). Depending on the timetable for permit approval, Navy coordination with Atlantic Environmental will ensure that dredging activities do not interfere with or bias any sampling activities on or near the Thames River. For information on the status of the dredging permit, contact Mr. Thomas Ouellette (DEP/Coastal Management) at (203) 566-7404.

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- 4) A Community Relations Plan was not addressed in the "Final Plan of Action". What future provisions are planned to document this issue.

Specific Comments:

- 1) Section 2.5.1, Page 14 - The second paragraph notes that the southern portion of the site has a ground water classification of GB/GA. It was incorrectly noted that the immediate goal is to maintain water at Class GB conditions. The State of Connecticut ground water classification (GB/GA) refers to ground waters which may not be suitable for direct human consumption without treatment due to waste discharges, spills or leaks of chemicals or land use impacts. The State's goal is to restore the ground water to drinking water quality (GA).
- 2) Section 4.1, Page 58 - The last paragraph notes that all drill cuttings with visual contamination or with significant volatile organic readings will be contained in 55 gallon drums. It is DEP policy that all soils that cannot be returned to the borehole and that exceed CT Drinking Water Standards or Volatile Organic Action Levels must be containerized and disposed of accordingly.
- 3) Section 4.2.4, Page 73 - The last paragraph notes that a surface water sample may be collected from the Thames River to determine the possible affect of river water quality on ground water underlying the Goss Cove Landfill. It seems that the rationale for taking a surface water sample should be to identify what impact the site may have on the river.

If you have any questions, please do not hesitate to contact me at (203) 566-5486.

Sincerely,



Paul Jameson
Environmental Analyst II
Site Remediation & Closure Division
Waste Management Bureau

cc: Paul Marchessault
William Mansfield
Paul Burgess