



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02205-2211

March 5, 1992

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Waste Management Bureau  
Site Remediation Division

Ms. Adrienne P. Townsel  
U.S. Department of the Navy  
Northern Division - NAVFAC  
U.S. Naval Base - Building 77L  
Philadelphia, PA 19112

Dear Ms. Townsel:

This letter is in regard to the September 1989 report entitled "Hydrogeologic Investigation: Underground Storage Tanks OT-4, OT-7, OT-8, OT-9 and 54-H - U.S. Naval Submarine Base - New London, Groton, Connecticut" prepared by Fuss & O'Neill, Inc. EPA has reviewed this document and offers the following comments and recommendations with regard to additional investigatory work to be performed at the aforementioned underground storage tank areas.

Based on data provided in the above referenced report, there is evidence of releases of petroleum from these underground storage tanks (USTs) and/or their associated piping to ground water and soil. There is currently not enough information, however, to adequately characterize the nature and extent of releases related to these USTs. Although the data presented indicate that releases of No. 2 fuel oil and fuel-related BTEX compounds to soil and ground water have occurred, it is uncertain whether the presumed "waste oils" stored in the tanks designated as reclamation tanks also contain other hazardous constituents.

Given that the USTs in the upper base and lower base areas are potential sources of subsurface and ground water contamination, the UST's contents must be physically evaluated and sampled. Although results of the hydrogeologic investigation revealed the presence of No. 2 fuel oil and BTEX compounds in soil and ground water, there were no analyses conducted for other VOCs, semivolatiles, metals, pesticides or PCBs. Therefore, samples should be collected from each UST and analyzed for the full list of TCL/TAL parameters to confirm or deny the presence of hazardous constituents in the source areas. In addition, full TCL/TAL analyses should be conducted on soils and ground water near tanks OT-4, OT-5 and 54-H to define the extent of contamination in these areas. In addition, the "underground lines which run from the piers to the storage tank areas" in the upper base and piping between tanks in the lower base should be thoroughly investigated as potential sources of contamination.



Should you have any questions or comments with regard to the above, please do not hesitate to call me at (617) 573-5764. I look forward to hearing from you soon.

Sincerely,

*Carol A. Keating*

Carol A. Keating  
Remedial Project Manager  
Federal Facilities Superfund Section

cc: Paul Jameson, CTDEP  
William Mansfield, SUBASE New London  
Matthew Hoagland, USEPA  
Dale Weiss, Alliance Technologies Corporation