



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

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

March 30, 1992

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 office is in receipt of the Installation Restoration Program (IRP) Community Relations Plan (CRP) for the Naval Submarine Base New London. Upon review of this draft document, EPA offers the following comments and recommendations.

**Page 1, 4th ¶** - Since it appears as though the CRP will be final prior to the signing of the FFA, the first sentence should read as follows: "This plan will be amended as needed pursuant to Section 26.2 of the SUBASE Federal Facility Agreement (FFA)."

**Page 4, 4th ¶, Last sentence** - "All IRP activities at the SUBASE are reviewed by EPA and DEP, including community relations activities."

**Page 4, Last ¶** - This paragraph is incorrect. First, this section should clearly explain that the Remedial Investigation (RI) has only been conducted for a number of sites on the SUBASE. Secondly, pursuant to EPA's November 12, 1991 comment letter on the draft IRP report, sufficient data has not yet been collected for the three RI sites. Therefore, a Phase II RI will be necessary prior to the commencement of a Final Feasibility Study. It is possible, however, that a Focussed Feasibility Study could be developed from information gathered during the Phase I investigation and used to formulate an interim remedial action(s).

**Page 6, 2nd ¶** - "As of October 1991, eleven areas have been investigated..." The CRP should distinguish between those sites in the Site Inspection (SI) phase and those in the RI phase.

In addition, a sentence should be added which mentions the underground storage tank (UST) areas and the contamination that was revealed in the September 1989 Hydrogeologic Investigation Report. These areas are known areas of contamination and warrant further investigation under the IRP.



**Page 6, 3rd ¶, Last sentence** - "The site presents no risk to human health or the environment, and no further cleanup action is recommended." This statement may be inaccurate and should be deleted until further investigatory work is undertaken at the site.

Pursuant to EPA's November 12, 1991 comments on the August 1991 "Draft Report, Installation Restoration Study, Naval Submarine Base-New London, Groton, Connecticut," the amount of sampling which is performed for a PA/SI (Step I investigation) is only sufficient to determine the presence of contamination, not the nature or extent. The PA/SI relies on "indicators" of a release to determine if further investigation is necessary. Given that detectable levels of volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), inorganics, and pesticides were found at the site, a more thorough investigation (RI) is warranted to adequately determine the nature and extent of contamination so that a quantitative risk assessment can be performed.

**Page 9, 1st ¶** - "..., no further action is recommended." This statement is misleading and should be deleted. Pursuant to the above mentioned November 12, 1991 comment letter, EPA does not concur with the Navy's decision that no further action is necessary at this site. Additional soil and ground water samples must be collected to support a no further action recommendation.

**Page 12, 3rd ¶, Last sentence** - "For a detailed analysis of the contaminants found in this area..., refer to the Remedial Investigation Report issued in August 1991 and available at the information repositories listed on page 25." Only final documents should be placed in the information repositories. The August 1991 "Draft Report, Installation Restoration Study, Naval Submarine Base-New London, Groton, Connecticut" will not be **Final** until all comments have been addressed and issues regarding additional work to be performed are successfully resolved.

**Page 14 - Radiological Assessment** - Although EPA has in the past performed radiological assessments of the NSBNL area, the surveys were conducted primarily to assess levels of environmental radioactivity resulting from the maintenance and operation of nuclear-powered warships at NSBNL. In addition, EPA's investigative efforts were confined to the measurement of external gamma levels in public areas and sampling of river sediments and biota from areas where nuclear operations are or have been conducted. **They did not involve the sampling of land or landfill areas for low level radioactivity.** In addition, EPA's National Air and Radiation Environmental Laboratory in Montgomery, Alabama has reviewed Radiation Safety Associates, Inc.'s November 18, 1991 "Radiological Assessment - U.S. Naval Submarine Base, Groton, CT" and has raised some concern with

It is requested that this discussion be removed from the CRP until the issue of whether an acceptable radiological assessment has been performed at the Subbase can be resolved. This is an issue of considerable concern that will be discussed during Federal Facility Agreement (FFA) negotiations currently underway between the Navy, CTDEP, and EPA.

**Page 18, 2nd ¶, 3rd bullet** - Should be changed to "Do any of the discharged chemicals react with one another?"

**Page 25 - Appendix A** - An address should be given for the Shepard of the Sea Chapel since it is not on the base.

Effective March 1, 1992, the new hours of operation for the EPA Records Center are 10 a.m.-1 p.m. and 2 p.m.-5 p.m.

**Pag 26 - Appendix B** - The correct mail code for Jim Sebastian is (RPS), not (RPA). Also, effective February 1, 1992, Carol Keating replaced Paul Marchessault as the EPA Project Manager for the NSBNL.

Overall, I think the Draft CRP was well organized and written; Jordan Communications, Inc. should be congratulated on a job well done. Should you have any questions or comments relative to the above, please do not hesitate to call me at (617) 573-5764.

Sincerely,



Carol A. Keating  
Remedial Project Manager  
Federal Facilities Superfund Section

cc: Paul Jameson, CTDEP  
William Mansfield, SUBASE New London  
Jim Sebastian, U.S. EPA Region I - Office of Public Affairs