



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

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

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NSB NEW LONDON  
5090.3a

October 16, 1992

Deborah Stockdale, RPM  
U.S. Department of the Navy  
Northern Division  
10 Industrial Highway  
Code 1823, Mail Stop 82  
Lester, PA 19113-2090

RE: Review of US Navy Responses to US EPA Comments on the  
Draft Remedial Investigation (RI) Report and Risk  
Assessment

Dear Ms. Stockdale:

Attached you will find the US Environmental Protection Agency's  
comments from our review of the revised Phase I Remedial  
Investigation - Naval Submarine Base - New London, Groton, CT  
(August 1992).

As you can see, most of our concerns focus on missing information  
which the US Navy had agreed to provide in the response to our  
review of the DRAFT RI Study, dated November 12, 1991. Our page  
specific comments will reference the original page and section  
numbers of the document.

Please submit the missing information and reference the  
appropriate sections of the Phase I RI Report where this  
additional information should be incorporated.

Since I will be on travel for the next two weeks, you should feel  
free to contact Carol Keating if there are any questions with  
regard to these comments.

Sincerely,

Andrew F. Miniuks, Geologist  
Federal Facilities Superfund Section

Attachment

cc. Carol Keating, EPA  
William Mansfield, NSBNL  
Dale Weiss, TRC



ATTACHMENT

Outstanding Page Specific Comments to the  
Draft Report, Installation Restoration Study,  
August 1991

**Section 1**

Comment #3

Page 1-5, Section 1.2.3.1 - Provide a groundwater classification map as requested in EPA's November 12, 1991 comment letter.

**Section 2**

Comment #15

Page 2-26 - Submit bedrock contour map on a site-specific scale.

**Section 3**

Comment #6

Page 3-12, Section 3.6, (b) - Provide a map of the stratified drift aquifer as indicated.

Comment #7

Page 3-12, Section 3.7 - The US Navy's response to EPA's comments indicated that the text would be changed modified to note that the point of auger refusal does not necessarily mean that the top of bedrock was encountered. Modify the text in the response to this letter.

**Section 5**

Comment #13

Page 5-17, Second Paragraph - The US Navy's response to EPA's comments indicated that a revision to Section 5.2.1.2 would be made. EPA could not locate the revised text. Submit revised section of text in the response to this letter.

Comment #14

Page 5-18, First Paragraph - The US Navy's response to EPA's comments indicated that a revision to this section would be made. EPA could not located the revised text. Submit revised section of text in the response to this letter.

**Section 8**

Comment #13

Page 8-13, Second Paragraph - The US Navy's response to EPA's comments indicated that Plate 4-1 would illustrate the extent of groundwater contamination. This plate has not been modified. Submit revised plate in response to this letter.

**Appendices**

Appendix A

- The text of Appendix A was not modified to incorporate the depths of the soil gas samples. Submit revised appendix or an appropriate reference in response to this letter.

Appendix D

Page D-3, Fourth Paragraph - The text of Appendix D was not modified to reference the updated water quality discussion of the Thames River. Submit revised appendix or an appropriate reference in response to this letter.

**US Navy's Responses to EPA's Comments (Nov. 12, 1991) on Risk Assessment for the Installation Restoration Study (August 1991)**

- The text of the Risk Assessment was not modified as indicated by the US Navy. Submit a revised Risk Assessment text in response to this letter.

Technical Review of Section 3.0 and  
Appendix B of Draft RI Report

General Comments

1. The following items need to be addressed in figures throughout Section 3.0:
  - Cross-sections must illustrate important hydrologic features (e.g., water table, water table elevations and flow directions). Revise the appropriate cross-sections.
  - Although lithologic units have been noted directly on the cross-sections, the blank legend section and the alternating "LEGEND" label above this section lacks consistency. Add a key to all cross-sections.
  - A geologic cross-section locations map for Area A is not included and must be added to accurately interpret Figures 3-17, 3-18, 3-19 and 3-20. Submit a geologic cross-sections map for Figures 3-17, 3-18, 3-19 and 3-20.

Specific Comments

1. Figure 3-2

A bedrock geology map of larger scale has been added, but the following items are still outstanding and should be submitted:

- a figure describing the topography of the bedrock surface (with indications of confidence in data noted on figure); and
- a figure describing the location of wells and borings to correlate the borings and well logs.

2. Figure 3-7

The Boring Logs of 7TB3 and 7TB5 indicate a change in the lithology at 18-20 ft. This figure needs to be edited to accurately reflect this information.

3. Figure 3-10

The following items need to be included in Figure 3-10:

- the lithologic unit in Boring Log 8MW4 from 14-19 feet; and

- an accurate representation of Boring Log 8MW2 in Figure 3-10.

4. Figure 3-15

The following items need to be included in Figure 3-15:

- the lithologic unit in Boring Log 18TB1 from 13.5-20 feet; and

- an accurate representation of Boring Log 18TB2 from 0.85 to 13.4 feet in Figure 3-15.

5. Figure 3-19

The following items need to be included in Figure 3-19:

- the lithologic unit in Boring Log 2DMW16S from 6-8 feet; and

- a sand and silt layer is represented near the surface at 2DMW16S and 3MW12S. Data from Boring Log 2LMW9S at 32.0 - 38.0 feet supports a continuation of this layer. Modify the cross-section to represent the stratigraphy.

6. Figure 3-20

The following items need to be included in Figure 3-20:

- Boring Log 2DMW10D is not accurately represented in figure 3-20 with regard to lithology and the depth to bedrock. Revise the cross-section to reflect this data.

- Boring Logs 7MW2, 7MW3, 2DMW11D and 3MW12S in Appendix B to complete review of Figure 3-20.

7. Figure 3-23

The following items need to be included in Figure 3-23:

- Boring Log 6TB3 references fine to coarse sand at 6.0 to 8.0 feet and again at 14.0 to 16.0 feet. Revise Figure 3-23 to accurately reflect these strata.

- Boring Log 6TB4 lists a layer of silt and clay at 6.0 to 20.0 feet. Revise Figure 3-23 to accurately reflect this layer.