



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

November 9, 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: Proposed Locations for the Collection of Background
Soil Samples for Inorganic Constituents at the US Navy
Submarine Base - New London

Dear Ms. Stockdale:

The purpose of this letter is to transmit EPA's comments on the proposed locations for the collection of background soil samples for inorganics. The US Navy has proposed to install eight (8) soil borings and then collect two (2) soil samples per boring; the first sample will be collected from 0 to 2 feet below grade while the second sample will be collected from 2 to 4 feet below grade.

General Comments -

1. EPA has historically defined background conditions for soils as the collection of representative soil samples that are up-gradient of all zone(s) of contamination and are not affected by the base operations. In some cases, the proposed locations of the soil borings appear to be located either within areas where backfilling operations may have taken place or within areas under investigation (e.g., the Area A Wetland).

Therefore, the US Navy should modify the proposed workplan to ensure that all soil samples gathered to determine background concentrations will be gathered from undisturbed soils.

Specific Comments -

1. Test Boring TB B2 - the location of this test boring may be located within the area northwest of the Torpedo Shops where backfilling of a naturally-occurring depression had occurred.

If this is correct, then the US Navy should modify the proposed workplan to ensure that the soil samples will be gathered from undisturbed native soils.



2. Test Boring TB B5 - the location of this test boring appears to be located within the historical extent of the Area A Wetland.

If this is correct, then the US Navy should modify the proposed workplan to ensure that the soil samples are not gathered from within the boundaries (either current or historical) of any of the units under investigation.

3. Test Boring TB B6 - the location of this test boring appears to be within the historical limits of the Goss Cove Landfill.

If this is correct, then the US Navy should modify the proposed workplan to ensure that the soil samples are gathered from areas that are up-gradient of all zone(s) of contamination and are not affected by the base operations.

The US Navy should provide EPA with a brief description of either the modifications that the US Navy will be making to the proposed workplan or provide additional information on the implementation of the proposed workplan.

If there are any questions regarding these comments, you should feel free to call me at (617)573-9614.

Sincerely,



Andrew F. Miniuks, Geologist
Federal Facilities Superfund Section

Attachment

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