

December 14, 1992

Mr. Andrew F. Miniuks, Geologist
United States Environmental
Protection Agency
Federal Facilities Superfund Section
Region I
J.F.K. Federal Building (HAN-CAN1)
Boston, MA 02203

RE: Phase I Remedial Investigation
Naval Submarine Base - New London, Groton, Connecticut
Atlantic Project No.: 1256-10

Dear Mr. Miniuks:

Atlantic, on behalf of the Navy, has prepared this response to your comments of October 16, 1992 regarding the Phase I RI.

Regarding "Outstanding Page-Specific Comments," it was our understanding that all of these changes will be incorporated into the Phase II RI report, not the Phase I RI report. Our understanding is based on a fax transmission from Carol Keating dated July 29, 1992 (enclosed) which specifically lists comments to be addressed to finalize the Phase I RI. All comments have been adequately addressed in the Navy's response to comments which was included in the preface to the Phase I RI. The Navy and the USEPA have the same goal for this project, which is to define any areas which require remediation and to perform any such remediation as soon as technically feasible. To achieve this goal, a Phase II RI Work Plan will soon be sent to your office and to other TRC members for review and comment.

Regarding the "Technical Review of Section 3.0 and Appendix B" comments, Atlantic has the following responses.

General Comments

1. It was our understanding that water table elevations and flow directions will be shown in all Phase II RI cross-sections and that Phase I cross-sections would remain as is.

As stated, all lithological units are labelled in each figure. The "legend" label in the title block should have been deleted.

Geologic cross-sections for Area A are shown in Plate 3-1, which was included in the report.

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Specific Comments

1. It was our understanding that bedrock surface contour maps will be included in the Phase II RI, not the Phase I RI.

- 2-5 & 7. We have reviewed our boring logs and cross-sections and do not feel any revisions are necessary. In preparing cross-sections, we are trying to depict a two-dimensional surface for which we have limited data. To make this depiction, we have in many cross-sections depicted soils with similar but different boring log descriptions into one unit (fine sand and silt verses silt and fine sand). For purposes of depicting cross-sections, a finer distinction is not necessary and misrepresents the accuracy of a cross-section. Other similar generalizations were made. For example, materials above sand and silt layers with shell fragments were characterized as fill in cross-sections even though the boring log did not specifically call these materials fill. In the field, we only label materials as fill if they contain typical fill materials (e.g., bricks, metals, etc.) Clean sand and gravel "fill" would not be labelled as fill in a boring log.

6. This figure will be revised to accurately represent boring log 2DM10D. There was a minor drafting error made in preparation of this boring log.

In conclusion, the revisions suggested by your comments are more appropriately addressed in the Phase II RI if our goal is to remediate the sites as soon as technically feasible. I hope this response will serve to satisfactorily address your comments and that, other than the revised cross-sections, no further revisions of the Phase I RI will be necessary.

Sincerely,

ATLANTIC ENVIRONMENTAL
SERVICES, INC.


Barry L. Giroux, P.E.
Project Manager


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cc: D. Stockdale - NORDIV
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ATLANTIC