



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

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

June 9, 1993

David Mui  
Environmental Restoration Branch  
Naval Facilities Engineering Command  
U.S. Department of the Navy  
10 Industrial Way  
Mail Stop 82  
Lester, PA 19113-2090

Dear Mr. Mui:

On May 12, 1993 EPA received four copies of the final Action Memorandum for Building 31 at the Naval Submarine Base New London (NSBNL), Groton, Connecticut. EPA conducted a review of the revised Action Memorandum to ensure that items discussed during our April 30, 1993 conference call were addressed in the final document. Those issues raised in EPA's April 20, 21 and May 6, 1993 comment letters which have not been adequately addressed are outlined below:

- EPA Comment #2

EPA had queried in its April 20, 1993 comment letter that a comparison of soils data should be made to site-specific background data. During the April 30, 1993 conference call, it was stated that background concentrations would be derived for the Lower Subbase. However, the final Action Memorandum does not state that site-specific background levels will be determined prior to performing confirmatory sampling. Without site-specific background samples, it will be impossible to confirm that appropriate clean-up concentrations have been achieved.

- EPA Comment #6

In its aforementioned comment letters, EPA was concerned that air monitoring was not discussed in the text of the proposed removal action. The Navy responded that text would be added to Section 5.1.1.1 to address air monitoring. Although the text in the May 1993 version has been modified since the April 9 submission, it does not address any of the concerns raised in EPA's May 6, 1993 correspondence. Please explain.



- EPA Comment #15

The Action Memorandum proposes to solidify the majority of contaminated soils, which will restrict migration of contaminants from the site into the Thames River via ground water discharge to surface water. Also, the Navy has previously agreed to investigate ground water contamination during the Study Area Screening Evaluation. However, the Action Memorandum still has not acknowledged the fact that ground water discharge to surface water is a potential migration pathway for contaminant migration. Please clarify.

- EPA Comment #21

During the April 30, 1993 conference call, NUS stated that strength testing of the solidified material could be included in the specifications put out to bidders as part of the treatment standards. However, the inclusion of strength testing in the treatability study has not been mentioned in the Action Memorandum. Please clarify.

Should you have any questions in regards to the above items, please do not hesitate to contact me at (617) 573-5764. Thank you in advance for your assistance in this matter.

Sincerely,



Carol A. Keating  
Remedial Project Manager  
Federal Facilities Superfund Section

cc: William Mansfield, NSBNL  
Adam Sullivan, CTDEP  
Dale Weiss, TRC