



DEPARTMENT OF THE NAVY

NORTHERN DIVISION  
NAVAL FACILITIES ENGINEERING COMMAND  
10 INDUSTRIAL HIGHWAY  
MAIL STOP, #82  
LESTER, PA 19113-2090

IN REPLY REFER TO

5090  
Ser 2202/1823/ME  
AUG 05 1994

Ms. Christine Williams  
Federal Facilities Section  
U.S. Environmental Protection Agency  
Region I  
JFK Federal Building  
Boston, MA 02203-2211

Re: PROBLEMS ENCOUNTERED AT THE SPLIT SAMPLING EVENT AT THE  
NAVAL SUBMARINE BASE-NEW LONDON, GROTON, CONNECTICUT

Dear Ms Williams:

This letter serves as a response to the EPA's letter dated July 22, 1994 requesting to resample monitoring well 2DMW29S. The split sampling of this well was agreed to and was scheduled for July 12, 1994 at 10:30 A.M. The Navy's contractor (Halliburton NUS) waited at the Main Gate to meet personnel from the CT DEP from 10:25 A.M. to 11:10 A.M. At 11:10 A.M. HNUS left the gate, proceeded to monitoring well 2DMW29S and started to purge the monitoring well. At 11:30 A.M. Mark Leone of CT DEP called HNUS field manager and said they would be arriving at the Base shortly and to continue purging and, if HNUS was ready to sample before CT DEP arrived, to begin split sampling and fill a bottle set for the CT DEP. At 1:00 P.M. CT DEP personnel arrived at well 2DMW29S. By this time the well had been sampled, and a split for the CT DEP had been taken. Also at that time, CT DEP was asked if they would prefer HNUS to resample the well, but CT DEP declined.

The Navy understands that chain of custody forms should have been completed at the time of the split samples being transferred to the CT DEP. In absence of the chain of custody forms the split samples received by CT DEP would most likely be considered invalid.

As soon as HNUS returned to their on-site trailer to pack the samples for shipment, they noticed, as part of the final quality assurance check, that CT DEP had inadvertently been given two filtered metal samples, instead of one filtered and one unfiltered metal sample. Fortunately, Mark Lewis of the CT DEP stopped by the trailer and one filtered metal sample was exchanged for an unfiltered metal sample. Again, no chain of custody forms were completed.

The Navy agrees that all the split samples given to the CT DEP

should not be analyzed based on CT DEP not receiving the chain of custody forms. The chain of custody forms for Navy's samples have been completed, except for the filtered metal sample that was given to the CT DEP. This sample will be considered invalid. The Navy believes the analysis results of our samples will be considered valid by the Navy's validation contractor and will be included in the Phase II RI Report.

Therefore, we feel that the Phase II Remedial Investigation should continue without delay. If an additional round of groundwater sampling is necessary, arrangements can be made at that time to split sample a well with the EPA and CT DEP oversight.

Please call me at (610) 595-0567 ext. 162 if you would like to discuss this further.

Sincerely,



MARK EVANS  
Remedial Project Manager  
By direction of the Commanding Officer

Copy to:  
Mark Lewis, CT DEP  
Andy Stackpole, SUBASE New London  
Matt Cochran, HNUS

Internal copy to:

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