



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

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

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January 12, 1995

Mark Evans, Remedial Project Manager  
U.S. Department of the Navy  
Naval Facilities Engineering Command  
Northern Division  
10 Industrial Highway  
Code 1823, Mail Stop 82  
Lester, PA 19113-2090

Re: Draft Supplemental Initial Assessment Study

Dear Mr. Evans:

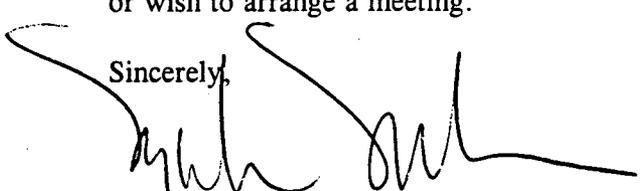
I am writing in response to your request for EPA to review the *Draft Supplemental Initial Assessment Study* ("SIAS") dated November 1994. EPA has reviewed the recommendations in this report regarding the need for additional study. Generally, the report does not contain sufficient information for EPA to make a determination in this regard.

The intent of the report is to identify all hazardous waste storage areas (excluding satellite accumulation areas where there have been no releases) and all releases of hazardous substances. Based on the data presented, it is not possible to determine whether all of the hazardous waste storage areas have been included. Inclusion of the Part A RCRA Permit Application as an appendix to the report and a section discussing the RCRA regulated units and the RCRA status of each unit would be useful. Additionally, a record of spills at the base should be presented as an appendix to the report.

Many of the site figures presented in the report are lacking the details needed to evaluate the recommendations in the SIAS. Many of the maps do not identify potential contaminant source areas (e.g., the leach fields at the Torpedo Shops, Vault 31, location of incinerators, transformer location, etc.) or structures that are discussed in the text (e.g., the eight wooden sheds at Building A-85). The maps should indicate relevant site details (e.g., the locations of catch basins, subsurface piping, locations of interior sinks/floor drains/sumps, etc.) to ensure that all potential contaminant release points have been evaluated. A base-wide map showing the location of the sites discussed would also be helpful.

I look forward to working with you on this issue in order to jointly develop recommendations for further study. Please do not hesitate to contact me at (617) 573-5777 should you have any questions or wish to arrange a meeting.

Sincerely,

  
Kymberlee Keckler, Remedial Project Manager  
Federal Facilities Superfund Section



cc: Mark Lewis, CT DEP, Hartford, CT  
Andy Stackpole, NSBNL, Groton, CT  
Rona Gregory, USEPA, Boston, MA  
Patti Tyler, USEPA, Boston, MA  
Dale Weiss, TRC, Lowell, MA

## ATTACHMENT A

<u>Pages</u>	<u>Comment</u>
p. 10, ¶1	List all hazardous materials stored at Building A-85.
p. 11, ¶1	The existence and status of floor drains, sumps, and sinks, <i>etc.</i> in this facility should be discussed and indicated on Figure 3.
p. 11, ¶2	The dimensions of the wooden sheds should be specified and indicated on Figure 3.  Any catch basins located near Building A-85 or the wooden sheds should be discussed.
p. 11, ¶3	Since the asphalt was resurfaced in 1991 because of cracks and stains in the old asphalt, the possibility of a release of contaminants should be investigated.
p. 13, ¶1	Discuss the condition of the septic system and leaching fields.
p. 13, ¶2	Discuss the existence and status of floor drains, sumps, and sinks, <i>etc.</i> in this facility.  Describe condition of the storage area floor and the drums.
p. 14	Figure 4 should indicate the shallow sump in the maintenance area, all septic systems, all leaching basins/fields, the Otto Fuel II wastewater tank, and the Otto Fuel product tank.
p. 15, ¶1	Discuss the condition of the septic system and the leach field and explain the existence and status of floor drains, sumps, and sinks, <i>etc.</i> in this facility.
p. 15, ¶2	The condition, age, size, and composition of the Otto Fuel II wastewater tank should be indicated in the text.  Soil sampling results should be presented.
p. 15, ¶4	The condition, age, size, and composition of the Otto Fuel product tank should be indicated in the text. The report should also indicate the tank closure status.  In the report, the septic system is described as the "north system." The text should clarify whether it is the same system described earlier as being located southwest of Building 450.
p. 16, ¶2	The oil/water separator and oily waste containment tank and controls shown in Figure 5 are not addressed in report. The separator, tank, and their relationship to OT #5 should be described in the text.  The condition and activities of the truck dumping pad should be indicated in the report.

p. 17 The text on Figure 5 indicates two pumphouses are located. According to the report, one pumphouse was demolished.

The location of the underground piping associated with the manhole, catch basin, and utility vault should be indicated on Figure 5.

p. 20, ¶3 The report should reveal that soil (with lead concentrations exceeding 500 ppm) was not removed from the site and that an RI/FS will be performed.

p. 23, ¶1 Discuss any floor drains, sumps, and sinks, *etc.* in this facility.

p. 23, ¶3 Discuss any floor drains, sumps, and sinks, *etc.* in this facility.

p. 23, ¶5 Are the Weapons Storage Area and Weapons Center separate areas?

p. 27, ¶2 The condition, age, composition, contents, and usage of the underground storage tank should be described and the results of the soil sampling should be presented.

p. 27, ¶4 Historical practices at Building 40 should be described in greater detail.

It is not clear whether buildings 103, 106, 157, 173, 456, and 478, are considered part of this site. If they are part of the site, additional information about past use should be provided.

Buildings 456 and 478 are described as maintenance shops in the report. The text should indicate the types of hazardous wastes used and disposed at these facilities.

Incinerator and dumpster cleaning operations should be explained further. The report should explain the handling practices used to store and contain hazardous materials (including the type of materials stored there) during these operations.

p. 28 Figure 12 should depict the catch basin referred to in the text.

p. 29, ¶4 The railroad should be listed as a possible contaminant source. Removal of the acid storage tanks and underground piping should be documented in the report. The report should indicate the condition, age, size, and composition of the tanks at the time of removal.

p. 30 The former location of the tank and associated piping should be identified on Figure 13.

p. 32 On page 31, the text indicates that Figure 14 includes tanks highlighted by dotted lines. However, there are no dotted lines on the figure.

The location of the storm drains should be indicated on Figure 14.

p. 31, ¶4 The report should discuss the condition of the tanks and whether the tanks have been emptied.

- p. 31, ¶4 The report should include the results of the soil sampling at this site.
- p. 33, ¶3 The existence and status of the floor drains, sumps, and sinks, *etc.* in this facility should be discussed.
- p. 33, ¶5 The report should discuss the use of Building 97 during the period between 1963 and 1979.
- p. 36, ¶1 The text should discuss the existence and status of any waste oil tanks, dry wells, sumps, sink areas, floor drains, and manholes.
- p. 36, ¶1 The report should reveal whether the original garage had an underground waste oil tank. Soil data from the vicinity of tank should be included in the report.
- p. 39, ¶3 In 1989, the Navy's contractor personnel checked the site and did not see any evidence of the gas station or the underground tanks. (The tanks then were removed in 1993 according to paragraph 2.) The chronology and location of these comments in the report should be clarified. It is not clear whether underground storage tanks still exist at this site.
- p. 40 Table 3 indicates that no further action is planned for the Building 450 Waste Otto Fuel Tank, but on page 43 states that further investigation *is* planned. Moreover, the table indicates that additional work is recommended at the Building 450 Drum Storage Area, but page 45 recommends no further action.
- p. 41, ¶1 Building 397 was used for storage in the past according to the text. The report should note whether such storage was for hazardous materials. The report should describe past and current use of the DRMO buildings 479, 491, and 355.
- p. 43, ¶1 The condition, age, size and composition of the underground tank should be described in the report.
- The underground tank was used to temporarily store Otto Fuel II wastewater. The dates that the wastewater was stored should be included in the report. Also, the date when the tank was washed and backfilled with clean sand and the results of the soil sampling in the vicinity of the tank should be provided.
- p. 43, ¶5 The acronym "POL" should be clarified.
- If true, this section should explicitly state that there is no record or evidence of a release of contaminants. Base-wide spill records should also be attached as an appendix to support this statement.
- p. 45, ¶1 The text needs to discuss the existence and status of any floor drains, sumps, and sinks, *etc.* in this facility.

- p. 45, ¶3 The historical use of Building 281 before it was used as a golf course pesticide shop should be described. It is unclear whether Building 281 was a pesticide storage area. Figure 21 should indicate the area of the new storage facility for pesticides.
- The process of mixing pesticides should be explained.
- The dimensions of the large metal box should be provided. The report should mention how the wastewater associated with the metal box was collected.
- The text should specify when the wooden storage shed was cleaned.
- The text should discuss the existence and status of floor drains, sumps, and sinks, *etc.* in this facility.
- p. 45, ¶5 Because of the length of pesticide mixing operations at this site, the importance of pesticides as contaminants of concern in the nearby Area A Downstream, the proximity of the site to base recreational facilities, and the fact that pesticides were mixed outdoors in an uncontrolled (no spill pad, *etc.*) location, additional investigation of this site is necessary.
- p. 45, ¶6 The text should discuss the use of Building 400 before it became a pesticide storage and mixing facility. The report should indicate the current use of Building 400 and what clean-up activities have occurred.
- The text needs to discuss the existence and status of any floor drains, sumps, and sinks, *etc.* in Building 406.
- p. 46 The large metal box and the location of the new storage facility for pesticides should be indicated on Figure 21.
- p. 48, ¶3 Additional information regarding this site should be provided, including: whether the site is outdoors (not shown in Figure 23), the amount of oil leaked from the electrical transformer, the date of the release, the condition of the concrete/spill pad where leakage occurred, and the time required to clean up the spill. If the spill was not cleaned up immediately, rain could have transported contamination to adjacent surface areas, thereby warranting a sampling investigation.
- p. 48, ¶6 The text should specify the date(s) when the two potable water tanks were repainted and the date(s) when the leaded paint residue was removed.
- The report should include results from soil sampling at this site.
- p. 49 Figure 23 should present the location of Vault 31.
- pp. 50 & 51 Figures 24 and 25 should indicate the location of the potable water tanks.

- p. 52, ¶2 The text should discuss the use of the site between 1969 and 1982. Although the report states that the northern end of the landfill is used to store scrap metal, the south end of the landfill is not discussed.
- p. 52, ¶3 The underground drainage outfall pipe should be delineated on Figure 26.
- p. 52, ¶5 The report should include results from soil sampling in this area.
- p. 54, ¶2 Qualitative determinations of the significance of releases that may have occurred in the hazardous waste accumulation areas should be further explained. Spill records for these sites should be provided so that the significance of past spills can be determined.