



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I  
JOHN F. KENNEDY FEDERAL BUILDING  
BOSTON, MASSACHUSETTS 02203-0001

June 21, 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 Final Supplemental Initial Assessment Study (April 1995)

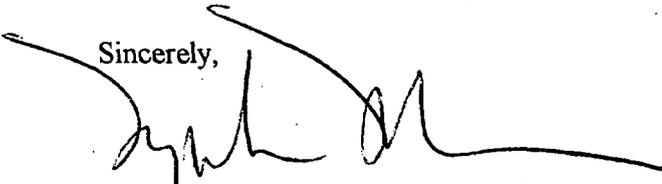
Dear Mr. Evans:

I am writing in response to your request for EPA to review the *Draft Final Supplemental Initial Assessment Study ("SIAS")*. EPA reviewed the document for adequacy in addressing EPA's written comments dated January 12, 1995 on the draft SIAS, and the discussions held at our February 23, 1995 meeting. EPA also evaluated the Navy's recommendations regarding the need for additional investigations.

Although several comments have been adequately addressed, the general concerns discussed in the aforementioned letter and at the meeting are still not fully addressed. In particular, hazardous waste storage information and a summary of site spills was not included. It is unclear whether the draft final SIAS still does not contain sufficient information to determine if all hazardous waste storage areas and releases of hazardous substances have been identified. Additionally, the report does not provide sufficient information to support no further action recommendations for several sites, including the DRMO Building 355, Pesticide Use: Public Works, and the Hazardous Waste Accumulation Areas. This is discussed further on Attachment A.

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

Sincerely,



Kimberlee Keckler, Remedial Project Manager  
Federal Facilities Superfund Section

Attachment



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cc: Mark Lewis, CT DEP, Hartford, CT  
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## ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. 3, ¶1	Although spill records from 1989 to 1994 were reviewed, spills before 1989 should also be reviewed as hazardous materials may have been stored at many of the sites before 1989. If no written spill records are available for this time period, the Navy needs to demonstrate that no significant releases have occurred on the base prior to 1989.
p. 10, §3.1.1	EPA repeats its request that the SIAS describe the past and current use of the DRMO buildings 479, 491, and 355.
p. 10, ¶5	The SIAS should specifically address Building 355 since the Phase II RI does not.
p. 12, ¶3	This paragraph, which references Appendix A for supporting data, states that no OTTO Fuel was detected in the three soil samples collected near the OTTO Fuel waste water tank in 1989. The SIAS should clarify that OTTO Fuel may have been present in soil below detection limits, and that elevated concentrations of OTTO Fuel were detected in ground water collected from a monitoring well located adjacent to the fuel tank. The report in Appendix A recommends further investigation to determine the source of groundwater contamination.
p. 12, §3.1.3	<p>The text states that Building 450 Drum Storage Area is currently used as 90-day accumulation area for solid hazardous waste. The text needs to also discuss the historical use of this area, and potential for any undocumented spills or releases of hazardous materials that may have occurred prior to 1989. Confirmatory sampling is warranted to verify the absence of historical spills or releases.</p> <p>Given the current use of this area, the SIAS does not provide sufficient information to support a no further action recommendation for Building 450.</p>
p. 14, ¶1	<p>The text states that Building 281 contains no floor drains or sumps, but has one sink. The text should describe where wastewater from the sink is discharged (<i>e.g.</i>, septic system). The Navy should address this potential contaminant release point in follow-up investigations.</p> <p>The text should provide the approximate dates that pesticides were stored in Building 281. Quantities and types of pesticides stored in the building should also be identified if possible.</p>
p. 14, ¶5	The SIAS recommends additional investigation of the former pesticide mixing areas. Former pesticide storage areas should also be investigated. Alternatively,

additional information to demonstrate that the likelihood of past spills or releases is insignificant could be provided.

- p. 16, §3.3.3 The text should indicate if hazardous materials were stored in Building 400 during the 1940s through the 1970s.

The SIAS should describe the clean-up activities that were performed in the former pesticide storage and mixing areas, and how these areas were determined to be "clean." Supporting confirmatory data need to be provided.

The text states that spill records show no documented spills of pesticides at Building 400. The text should discuss the potential for any undocumented spills or releases of pesticides into the environment prior to 1989. Confirmatory sampling may be necessary to verify the absence of historical spills and releases.

- p. 18, §3.2.3 Estimate the quantity of spilled oil at Building 157, Vault 31.

- p. 25, §3.2.9 It is unclear why the third paragraph on page <sup>25</sup>(52) of the draft SIAS was deleted from the draft final SIAS. The paragraph, which discusses the high potential for contaminants from the DRMO Scrap Metal Storage Area to enter the environment, should be reinserted in the SIAS.

- p. 25, ¶4 The text states that *additional* soil sampling is necessary to identify potential heavy metal contamination. This implies that soil sampling has been conducted previously. Such data should be included in the SIAS.

- p. 27, §3.2.10 EPA requested that the significance of the releases that may have occurred in the hazardous waste accumulation areas be further explained and that spill records for the site be provided so that the significance of past releases can be determined. Currently, the SIAS provides insufficient information to support no further action conclusions for the Hazardous Waste Accumulation Areas.

Mark,

We checked Subase "cleaned" Bldg.

400 without checking w/ us.

Products that they had during the 1970's  
were Chloradane, Resmethrin, Pyrethrin,  
etc.

Subase need to give us more info on "clean"

Also, no spills were reported in our file.

Unofficially, spills would have occurred during →