



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WATER MANAGEMENT
PERMITTING, ENFORCEMENT & REMEDIATION DIVISION
FEDERAL REMEDIATION PROGRAM



June 26, 1995

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

Re: Correction to State Comments Regarding Phase II Remedial Investigation Report for
Naval Submarine Base New London, Groton, Connecticut

Dear Mr. Evans:

I have discovered an error in the technical comments which I submitted to you on June 23, 1995. The error was on page 18 of my comment letter, in the section which discusses Table 12-7. My comment letter incorrectly referenced USEPA Method 413.2 as a gravimetric method for analyzing Total Petroleum Hydrocarbons. The text should have stated that Method 413.2 uses infrared spectrometry. Enclosed is a replacement page 18, which has been updated to reflect this correction. Please substitute this page, and discard the original page 18.

I apologize for any inconvenience this may have caused.

If you have any questions regarding this letter, please contact me at (203) 424-3768.

Sincerely,

A handwritten signature in cursive script that reads "Mark R. Lewis".

Mark R. Lewis
Senior Environmental Analyst
Federal Remediation Program
Permitting, Enforcement & Remediation Division
Bureau of Water Management

cc: Ms. Kimberlee Keckler, US EPA Region 1, Federal Facilities Section
Mr. Andy Stackpole, NSBNL Environmental Department
Ms. Sheila Gleason, CTDEP, Water Management Bureau, Federal Remediation Program

Naval Submarine Base New London Phase 2 R.I.

State of Connecticut Comments

June 23, 1995

Page 18 of 22 Pages

Page 12-31 Table 12-7

This table includes TPH results for Phase II Round 2 ground water samples. As with soil samples, the table and accompanying text do not indicate what analytical method was used for TPH. Appendix D8 includes laboratory reports for some, but not all ground water samples. These show that some samples were analyzed for Oil and Grease using USEPA Method 413.2, while others were analyzed for TPH by USEPA Method 418.1. The use of Method 413.2 is not indicated anywhere in the text of the report, or in the accompanying tables. It is important to distinguish which method was used to analyze each sample, as the two methods do not necessarily yield results which can be directly compared. Method 418.1 is generally considered more appropriate for use with samples containing hydrocarbons. Method 413.2 will detect oils and greases of animal or vegetable origin, in addition to hydrocarbons. Material of animal or vegetable origin can be removed from the sample prior to analysis by filtering the extractant through silica gel. Most laboratories include this silica gel filtration as a routine part of their Total Petroleum Hydrocarbon Analysis under Method 418.1.

Page 12-42 Recommendations

The State cannot support the recommendation of No Further Action at the Torpedo Shops. Non carcinogenic risks for several contaminants at this site exceed unity, and several soil and water samples contain contamination which exceeds MCLs, the State's Proposed Soil and Ground Water Protection Criteria, or other ARAR or TBC values. As noted by Kymberlee Keckler in her letter dated April 7, 1995, the ground water classification of the site is GA. This means the State's goal is to restore the water to drinking water quality. Where this is not possible, deed restrictions or other institutional controls must be implemented to prevent use of the ground water. Deed restrictions would not apply as long as the base remains under Federal ownership. However, they would be required if the United States transfers the base to another person or entity.

Chapter 13- Goss Cove Landfill- Site 8

Page 13-16 Section 13.3.5 Hydrogeology

This section should include a discussion of the role of tidal fluctuations as it applies specifically to the Goss Cove landfill.

Page 13-17 Figure 13-3 Potentiometric Surface Map

This map should use a smaller and consistent contour interval. The wide and variable contour interval used in this map may obscure many important features of the potentiometric surface. This is particularly important at the Goss Cove landfill due to the proximity of this site to the