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

April 23, 1997

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: Data Gap Investigation Report

Dear Mr. Evans:

I am writing in response to your request for EPA to review the *Data Gap Investigation Report for the Goss Cove Landfill* dated March 1997. Detailed comments are provided in Attachment A.

As discussed on April 9, 1997, the Navy agreed to perform Optional Step #2, a simple contaminant fate and transport analysis to assess the potential extent of contaminant migration from the Goss Cove Landfill to Goss Cove and verify whether significant migration is currently occurring. This discussion should be incorporated into Section 4.

I look forward to working with you and the Connecticut Department of Environmental Protection on the Goss Cove Feasibility Study. Please do not hesitate to contact me at (617) 573-5777 should you have any questions.

Sincerely,

Kymberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: Mark Lewis, CTDEP, Hartford, CT
Andy Stackpole, NSBNL, Groton, CT
Patti Lynne Tyler, USEPA, Boston, MA
Ken Finkelstein, NOAA, Boston, MA
Jennifer Hayes, Gannett Fleming, Harrisburg, PA
Matthew Cochran, Brown & Root, Pittsburgh, PA

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ATTACHMENT A

Page	Comment
p. 2-5	According to the text, the installation of monitoring wells 8MW9S and 8MW10S included the placement of filter pack from the bottom of the well to approximately 2 feet above the screen. Please discuss whether a minimum of 6 inches of filter pack material was under the bottom of the screen to provide a firm footing and an unrestricted flow under the screened area.
p. 3-7	The characterization of groundwater concentrations is described as "low," "very low," and "minor" is not fully explained. PCE was detected in both subsurface soil and groundwater samples collected during the investigation. The text states that these concentrations were relatively low and minor by comparison, but does not explain the basis of comparison.
p. 3-10	Statements and conclusions regarding the extent of PCE groundwater contamination need to be reevaluated to ensure consistency. The report states that PCE contamination extends along a southeast to northwest axis and that this axis coincides with the general direction of groundwater flow. The report concludes in Section 3 that PCE contamination is migrating in a northwest direction. In Section 4, it is concluded that the contamination is migrating onto the site from a southeasterly direction and that the source area is most likely located off-site, southeast of the 8MW8S/8MW8D well cluster. The potentiometric map included as Figure 2-2, indicates that the general direction of groundwater flow is in a southwest direction, forming a northeast to southwest axis.
p. 3-10, bullet 3	The text is not consistent with Figure 3-3 with respect to the concentrations of PCE detected in shallow well 8MW8S.
p. 4-1	The recommendation that "no further groundwater investigations be conducted as part of the FS and that groundwater be removed from consideration as an Operable Unit" appears to be premature. Moreover, it is not consistent with our discussions of January 9, 1997 where we agreed to evaluate groundwater as part of the basewide groundwater OU or on April 9, 1997 where we agreed to evaluate whether Goss Cove could be contaminated by groundwater. The source of PCE contamination has not yet been confirmed. Also, conclusions regarding contaminant migration direction need to be better supported.