UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203-0001

March 23, 1999

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: Response to EPA Comments on the Draft Existing Data Summary Report for the Basewide Groundwater Operable Unit Remedial Investigation

Dear Mr. Evans:

EPA reviewed the *Responses to USEPA Comments of January 5, 1999 Regarding the Draft Existing Data Summary Report for the Basewide Groundwater Operable Unit Remedial Investigation* dated December 1998 for the Naval Submarine Base New London Groton." The response to comments ("RTC") is dated February 24, 1999. The RTC provides the Navy's positions with regard to general concerns and specific requests enumerated in EPA's original comments from January 1999. The numbering of comments and responses as given in the RTC is retained in the following for ease of cross-referencing. Detailed comments are provided in Attachment A.

In general, Navy gives serious consideration to EPA comments, suggestions, and recommendations, and is prepared to act upon them, in some cases following further discussion. The principal areas of disagreement are associated with EPA's letter dated July 29, 1997, which contains specific recommendations for groundwater monitoring to be included in the basewide groundwater OU RI. Many of the concerns articulated in the 1997 letter are still pertinent, and will require further discussion. However, site investigations and remedial efforts have progressed since the time of the letter, and for some areas, Navy's arguments that sufficient knowledge has been gained to obviate the need for some of the monitoring coverage advocated in 1997 are well founded. The Navy acknowledges (response to General Comment 2) that the 1997 recommendations "... will be considered during development of the WP/SAP," which appears to be the appropriate vehicle for resolution of these issues.

In response to General Comment 3, the Navy states that the screening methodology is such that COPCs for all media (including soil, sediment, surface water, and groundwater) become COPCs for groundwater, and that the Existing Data Summary Report ("EDSR") will be reviewed for consistency in this regard. This is an appropriately conservative approach.

Perhaps a statement to this effect could be added to the EDSR in Section 1.4.2 to clarify the intent of identifying COPCs for all media in association with the groundwater OU.

In response to General Comment 4, the Navy's view of the EDSR as a means of identifying areas in which existing data are adequate or require only limited additional data, as well as a means of identifying major data gaps, is sound. It is reasonable to limit analytes at locations where, for example, the Basewide Groundwater OU RI proposes to re-sample one or more existing wells to confirm historical observations. However, a full suite of analyses should be performed for samples obtained from new well installations.

I look forward to working with you on the base wide groundwater remedial investigation. Please do not hesitate to contact me at (617) 918-1385 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
Jennifer Stump, Gannett Fleming, Harrisburg, PA
Corey Rich, Tetra Tech-NUS, Pittsburgh, PA

ATTACHMENT A

Comment Number	Comment
2.	The Navy agrees to perform a geochemical assessment of mobility and transport of inorganics. This will be an important part of the RI, and is a welcome addition.
3.	The Comment refers to recommendations in the 1997 EPA letter for additional monitoring coverage of the Area A Wetland, with specific reference to new wells along the western, downgradient end of the wetland. There is monitoring coverage in this general area associated with the landfill closure that will meet some of the objectives of the 1997 recommendations. However, some monitoring of the downgradient limit of the wetland is warranted, in part as an upgradient reference for monitoring of the Area A Downstream. Furthermore, pesticides remain a general concern for the Area A Wetland owing to historical use patterns, and the 1997 recommendation to analyze for pesticides reflects an ongoing issue. As noted by Navy, it is appropriate to defer the issues of adequacy of monitoring coverage, as well as specific analytes, to discussions of the monitoring program that will be developed for this area.
5.	The Navy states that surface water quality issues for Site 3 will become moot because of remedial actions at upgradient sites and the sediment removal from the Downstream Watercourses. While these actions may argue against the need to analyze surface water as part of the Basewide Groundwater OU RI, it is appropriate to monitor surface water quality as part of Long-Term Monitoring for the site, with the intent of verifying the long-term efficacy of the remedial actions in source (upgradient) and discharge (Downstream Watercourses) areas with respect to impact on surface water. This issue should be re-visited at the time of development of the LTMP.
9.	The Comment noted a need for a well pair immediately downgradient of the dike separating Sites 2B and 3. The Navy notes that an overburden well is planned for this general area as part of the monitoring program for the Area A Landfill. The bedrock well should be considered here, as well, as it is expected that bedrock groundwater may discharge to the overburden in this area, and contamination that has reached bedrock in upgradient areas may represent a "source" to the overburden groundwater, surface water, and associated sediments in the Downstream Watercourses. Navy states that further discussions of this issue are needed. This is appropriate.

10. The Navy agrees that further characterization is needed to delineate the source(s) and extent of VOC contamination, and agrees to consider EPA's previous monitoring-well recommendations. It is appropriate to defer details to the WP/SAP, as noted. The proposal to perform additional exploration before locating permanent monitoring wells is, in principle, supported.

The Response implies that EPA's sole rationale for specific recommended monitoring locations is to determine nature and extent of pesticide contamination. The proposed wells serve other purposes, as well. In the upgradient portion of the site, where groundwater from potential upgradient sources (*e.g.*, Sites 2-A and 2-B, the Weapons Center, and the Torpedo Shops) may be discharging, there is a need to monitor for a range of possible contaminants. Also, along the western boundary of the site, the wells proposed in 1997 (16-19) would serve to monitor for contamination from any upgradient source before discharge to the river. Further discussion of well locations is warranted. Furthermore, pesticides remain a general concern for the site, and monitoring for pesticides will receive continued scrutiny in the development of the WP/SAP.

Finally, the Navy argues that remediation of contaminated soil and sediment at Site 3-A "... will eliminate the potential for future contaminant migration." While this is certainly the desired result of the remediation, it is noted that this does not obviate the need for monitoring groundwater. There remains a need to monitor groundwater in areas determined to be discharge areas for groundwater originating upgradient in areas of known historic contamination, with the potential for recontaminating the Area A Downstream Watercourses. There also remains a need to verify the assertion that contaminated soils and sediments at the site have not, in turn, acted as sources of contamination to the underlying groundwater.

15. The Comment noted a concern for historical detections of chlorinated VOCs in well 2WMW4D (albeit infrequent and at relatively low concentrations). The Navy proposes to add sampling of this well and the associated shallow well to the Basewide Groundwater OU RI program in order to evaluate this further. This is an appropriate response.

21. The original Comment pointed toward recommendations in the 1997 EPA letter for additional monitoring-well coverage in the Goss Cove Landfill area, particularly in regard to PCE contamination. The Navy responds that it has been determined that the source of the PCE is the off-site dry cleaners. While evidence to date pointing to the dry cleaners as a PCE source is quite compelling, a final determination has not been made that it is the only potential source for PCE found downgradient. One concern is possible disposal of waste

solvents or the historic use of chlorinated solvents to clean tanks in the Fuel Farm, particularly OT-5 (Site 9), the oily wastewater tank. There remains a need to demonstrate convincingly that these potential on-site sources of chlorinated solvents did not contribute to the observed PCE in bedrock at the Goss Cove Landfill. Further discussions are needed, particularly with regard to characterization of groundwater in bedrock downgradient of Site 9.

23. The Response provides a good explanation (turbidity in an unfiltered sample) for a historic high hit of lead at 15MW3S. The proposed additional text will clarify the issue.