



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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NSB NEW LONDON
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June 14, 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: EPA Comments on the Existing Data Summary Report for the Basewide Groundwater Operable Unit Remedial Investigation at the Naval Submarine Base New London, Groton, Connecticut

Dear Mr. Evans:

EPA reviewed the "Existing Data Summary Report for the Basewide Groundwater Operable Unit Remedial Investigation for the Naval Submarine Base New London, Groton, Connecticut," dated May 1999 for consistency with the earlier exchange of comments and responses. Detailed comments are provided in Attachment A.

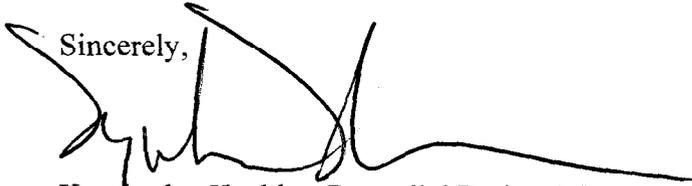
In general, EPA is pleased that the majority of the changes to the text that were agreed upon previously were made. However, a number of significant issues were deferred until development of the Sampling and Analysis Plan (SAP) for the Basewide Groundwater OU RI and the review process that will follow release of that document. Of particular note are the recommendations for groundwater monitoring coverage provided in an EPA letter of July 29, 1997. Navy takes issue with a many of these recommendations, noting that the status of several of the sites has evolved since 1997 (e.g., remediation of soil and sediment in the Area A Downstream Watercourses), and that some of the recommended monitoring will be covered under other programs (e.g., performance monitoring associated with remediation of the Area A Landfill).

In response to general comment 3, the original comment requested clarification of the link between COPCs identified in soils, sediments, and surface water and COPCs in groundwater.

The intent of the original general comment 4, was not to suggest that all samples be analyzed for every compound. Rather, a complete analyte list should be retained for any samples taken from *new wells* not previously sampled. This issue is should be addressed at the time of the development of the SAP.

I look forward to working with you to protecting the groundwater resources of the Naval Submarine Base. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kimberlee Keckler', written over a horizontal line.

Kimberlee 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

<u>Comment #</u>	<u>Comment</u>
2	The original Comment requested a geochemical assessment of sources and transport mechanisms for inorganics, particularly with respect to the impact of the landfill on redox conditions and the mobility of arsenic and lead. Although the February 1999 response was positive, the revised EDSR does not address this issue explicitly. The EDSR does, however, leave room for such an assessment through its rather general statement (§2.3.7, p. 2-56), "...The results of the sampling activities should be evaluated within the Basewide Groundwater OU RI." It should be noted that an assessment of the influence of the landfill on the groundwater chemistry and transport of inorganics remains an essential part of the Basewide Groundwater OU RI.
3	Specific monitoring well coverage for the Area A Wetland is deferred to the long-term monitoring plan (LTMP). While this deferral is appropriate, it should be noted that the scope of the necessary monitoring in this area remains unresolved.
5	One critical function of monitoring is to verify that the remedies in place are effective. Monitoring of surface water in Site 3 should be discussed in conjunction with the design of the LTMP.
6	EPA's original comment recommended an overburden/bedrock well pair in the area immediately downgradient of the dike separating the Area A Wetland and Site 3. However, the specific issue of a bedrock well at the recommended location is not addressed, and it is noted that it must still be resolved in some forum (<i>e.g.</i> , discussion of the groundwater monitoring program for the Area A Landfill).
10	Although the Navy agrees that additional monitoring wells are needed to delineate the VOC plume downgradient of the Torpedo Shops, many of EPA's specific recommendations are unresolved. Resolution is deferred to the SAP for the Basewide Groundwater OU RI and the subsequent review process.
12	The original review comment requested further discussion in support of the claim that contaminated sediment and surface water at the Torpedo Shops area are "not expected to impact the groundwater at this site." Navy's Response promised to provide the appropriate arguments. The revised text of §2.7.4, p. 2-95 does not appear to reflect these changes.

- 15 The original Comment requested that further work be done to understand low-level detections of chlorinated VOCs in bedrock well 2WMW4D. The response proposed to re-sample the well pair (2WMW4S, 2WMW4D). This explicit recommendation does not appear to be presented in the revised report. The re-sampling of this well pair remains a worthwhile target.
- 16 The revised EDSR does not reflect the changes in RBCs. The updated RBC table must be used in the Basewide Groundwater RI.