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LETTER AND U S EPA REGION I COMMENTS ON DRAFT SAMPLING AND ANALYSIS PLAN
DATA GAP INVESTIGATION FOR THE FORMER TANK FARM SITE 23 NSB NEW LONDON
CT
8/25/2014
U S EPA REGION I



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION I

5 Post Office Square, Suite 100
Boston, MA 02109-3912

August 25, 2014

Ms. Elizabeth Middleton
Remedial Project Manager
Environmental Restoration
NAVFAC MIDLANT OPNEEV
Bldg. Z-144
9742 Maryland Avenue
Norfolk, VA 23511-3095

Re: Draft Sampling and Analysis Plan - Data Gap Investigation for the Former Tank Farm (Site 23)

Dear Ms. Middleton:

EPA reviewed the *Draft Sampling and Analysis Plan (SAP) for Site 23 – Former Tank Farm* at the Naval Submarine Base New London Superfund Site, dated July 2014. The SAP presents the sampling design and rationale and the analytical and data assessment requirements for the project in accordance with the requirements of the *Uniform Federal Policy for Quality Assurance Plans* and *EPA Guidance for Quality Assurance Project Plans*. Detailed comments are provided in Attachment A.

Please add a figure depicting the historical locations the OT-10 system, including the dump sump, tanks, separator, and piping. Since contaminant releases may have occurred from any of these components, it is necessary to understand where earlier samples were collected and where proposed samples should be collected relative to these components to ensure adequate characterization.

Please clarify how the OT-4 and the OT-10 system components will be located in the field so that samples can be collected from the intended locations relative to these features in the SAP. Please include documentation supporting the identified locations in the SAP.

Please describe how the OT-10 system was modified (what piping was removed and added) when tanks NN-02 and NN-03 were closed so that the oil-water separator directly received stormwater from the dump sump rather than receiving pumped flow from NN-03.

I look forward to working with you and the CTDEEP to complete the environmental cleanup. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,

Kymerlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: Kenneth Feathers, CTDEEP, Hartford, CT
Tracey McKenzie, NSBNL, Groton, CT

ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. 10-4, §10.2.1, ¶1	The second sentence states that OT-4 water used to store tank bottom wastes from OT-1. However, OT-4 was previously sampled for TCL organics and TAL inorganics and Fuss & O’Neill (September 1989) stated that OT-4 and OT-5 were used as oil reclamation tanks. Since the history of OT-4 is uncertain, change the sampling and analysis requirements at OT-4 to be identical to that required for the OT-10 complex.
p. 10-6, §10.2.2, ¶1	Please clarify whether tanks NN-02 and NN-03 were removed when closed under RCRA and whether soil samples were collected. Provide a copy of the closure report as an appendix.
p. 10-8, §10.3, ¶2	Regarding the third bullet, define “RLs” and confirm whether this refers to laboratory reporting limits.
p. 10-10, §10.4, ¶1	The COPC list should be re-evaluated using all the data not just the surface soil data. Subsurface soil samples collected just above the water table could identify additional COPCs and impact residential risk. Please clarify the intent. Please identify specifically what data the Navy intends to use to conduct the human health risk assessment.
p. 11-1, §11.2, ¶2	Please revise this sentence to refer to supplemental soil data rather than just surface soil data.
p. 11-2, §11.2	Please replace the fourth bullet with: “Do target analyte concentrations in surface soil support the previous assumption of no ecological risk, which was based solely on the assumption that the setting was urban?”
p. 11-2, §11.3	Edit the text in the first bullet to require the same sampling and analysis parameters for OT-4 as required for the OT-10 complex.
p. 11-3, §11.3	First bullet: Supplemental data with concentrations less than those used in the human health risk assessment are not likely to impact the previously-calculated risk except for the fact that no surface soil data were previously available. Depending on the exposure details previously used, surface soil data may impact risk at lower concentrations than previously used for calculations. Second bullet: When the data are evaluated, the latest RSLs will need to be used for screening purposes. Please revise the text accordingly. Identify any changes to the RSLs from those used in the SAP to ensure that the latest RSLs are used for screening.

Third bullet: An ecological risk screening evaluation (Steps 1 and 2) needs to be conducted to demonstrate no ecological risk - rather than relying on the assumption that there is no ecological risk because the setting is considered urban.

Regarding the middle paragraph, please change the second sentence to: “The PALs are used to develop project quantitation limit goals that establish the sensitivity that the laboratory will strive to achieve for each analyte.”

p. 11-4, §11.5

Please supplement both bullets to include ecological risk.

p. 14-2, §14, ¶2

Regarding the penultimate sentence, surface soil samples shall be collected from the 0-1 foot interval and subsurface soil sample intervals may be up to two feet long. If additional soil is required to prepare samples for all analytical parameters, additional soil cores shall be collected adjacent to the original boring.

p. 14-3, §14, ¶1

Please edit the text here and modify SOP-3-07 to require that the GPS equipment used has an accuracy of one meter or better. Alternatively, conduct a survey by a licensed land surveyor.

In addition to surveying the sample locations, the location of pertinent site features shall be surveyed so the sampling map accurately represents the sample locations relative to site features. Please revise the text accordingly.

p. 14-3, §14, ¶5

Please revise the fourth sentence to refer to project quantitation limit goals rather than project action limits (PALs).

p. 17-1, §17, ¶1

Please modify the first sentence by: “... 1996; however, only three samples (SB/TW-11, HNUS-8, and HNUS-9) were analyzed for all the CERCLA contaminants of potential concern for the OT-4 site. All other samples were designed to detect only petroleum releases.”

Please correct the fourth sentence to: “... ranging from 0 to 14 feet bgs.”

Please add a new penultimate sentence: “Only two of these samples (OT10-SO01 and OT10-SO05) were analyzed for all the CERCLA contaminants of potential concern for the OT-10 site. All other samples were designed to detect only petroleum releases.”

p. 17-1, §17, ¶3

Please add a new third sentence: “Final sample locations will be approved by EPA and CTDEEP before samples are collected.”

p. 17-3, §17

Regarding the second bullet, please edit the text to require the same sampling and analysis parameters for OT-4 as required for the OT-10 complex.

p. 18-1, §18

Regarding the analyses, please edit the table to require the same analytical parameters for OT-4 as required for the OT-10 complex. Edit the MS/MSD and field duplicate analyses accordingly.

- p. 18-2, §18 Edit Note 3 to refer to “semi-volatile organic compounds (SIM and full scan).”
- p. 20-1, §20 Based on maintaining the same sampling and analysis parameters for OT-4 and the OT-10 complex, the number of samples (20) for each analyte is correct as shown in this table. Please also ensure that one field duplicate is collected from OT-4 and OT-10, preferably from the surface soil samples.
- p. 21-1, §21 Modify SOP-3-07 for this project work to require GPS accuracy of less than one meter or require a survey by a licensed land surveyor.
- p. 23-1, §23 Please also include CA-615 for aqueous mercury.
- Since several of these methods are also being used for aqueous samples, edit the table to include that matrix for them.
- p. 30-1, §30 Correct the metals SOPs to “CA-627 and CA-611.”
- Please also list the aqueous samples.
- Figure 17-1 Please edit the figure to show where previous soil borings were installed at OT-4 to collect soil samples for CERCLA contaminants. In particular, add HNUS-8, HNUS-9, and SB/TW-11 and also include the sample locations for any other samples that will be used for the risk assessment.
- Please relocate the proposed boring locations to avoid re-sampling in the immediate vicinity of these prior soil borings. Suggested locations (red dots) for sampling at OT-4 are presented in the attached JPEG figure.
- Please edit the figure to show where previous soil borings were installed at OT-10 to collect soil samples for CERCLA contaminants and for any other samples that will be used for the risk assessment.
- EPA withholds comment on the suitability of the sample locations at OT-10 until details for the OT-10 system configuration are provided (*see cover letter*).
- Please clarify how OT-4 and the OT-10 complex were located on this figure. Provide supporting documentation for the locations in an appendix.
- Please add labeled lines of latitude and longitude to this figure using state plane coordinates.