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STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

March 24, 1993

Deborah Stockdale
Environmental Restoration Branch
Naval Facilities Engineering Command
10 Industrial Way (Mail Stop 82)
Lester, PA 19113-2090

Re: Naval Submarine Base New London (NSBNL)
Groton/Ledyard, Connecticut

Comments on the Supplemental Step I Investigations proposed for the Construction Battalion Unit (CBU) Drum Storage Area and the Over Bank Disposal Area Northeast (OBDANE).

Dear Ms. Stockdale:

The Supplemental Step I investigations proposed for the CBU Drum Storage Area and the OBDANE have been reviewed by staff from the Permitting, Enforcement and Remediation Division of the Connecticut Department of Environmental Protection (DEP).

The investigations proposed for each site were outlined in a "Memorandum" dated March 1, 1993. The Memorandum was prepared by Atlantic Environmental Services, Inc. on behalf of the Navy's Northern Division Naval Facilities Engineering Command. Both sites will be incorporated within the Phase II Remedial Investigation (RI) work plans when finalized. The following are comments based on a review of the Memorandum.

1. Page 196, Section 10 of the Phase II Remedial Investigation Draft Work Plan - The schedule outlined within this section will have to be revised to incorporate the Supplemental Step I investigations proposed for the CBU Drum Storage Area and OBDANE sites.

2. Section 7.1.1, CBU Drum Storage Area

   A) Table 7-3 must include provisions for total petroleum hydrocarbon (TPH) analysis along with the other proposed parameters. Analytical results from the Phase 1 RI performed at this site detected TPH in the three soil sample locations ranging from 110 to 9800 ppm. The TPH analytical method is appropriate considering that waste oils and lube oils were stored at this site. TPH analysis is necessary in determining the horizontal and vertical extent of petroleum contamination.

B) It should be reiterated that DEP requires remedial action at sites where it is found that the sum of all hydrocarbons in the soil exceed 100 ppm. This requirement is applicable at the NSBNL because it is located in an area with a groundwater classification of GA and GB/GA. As such, DEP will require that the NSBNL sample for TPH at all sites where it is determined that petroleum contamination is present.

If you have any question with the above comments, please call me at (203) 566-5486.

Sincerely,

Paul Jameson

Paul Jameson
Senior Environmental Analyst
Permitting, Enforcement and
Remediation Division
Bureau of Water Management

cc: Andrew Miniuks, EPA
William Mansfield, NSBNL
Jennifer Kertanis, DOHS