

ATLANTIC

ENVIRONMENTAL SERVICES, INC.

engineers
geologists
scientists

May 6, 1993

Mr. Adam Sullivan
Transfer Program
Waste Management Bureau
CTDEP
165 Capitol Avenue
Hartford, CT 06106

RE: Phase II RI Work Plan
Naval Submarine Base - New London
Groton, Connecticut
Atlantic Project No: 1256-18-04

Dear Mr. Sullivan:

Enclosed please find for your review a copy of the Navy responses to your comments dated March 24, 1993 regarding the CBU and OBDANE sections dated March 1, 1993 of the Phase II Remedial Investigation Work Plan and Field Sampling Plan.

If possible, we would like to discuss any comments you may have regarding these responses at the same time we discuss your comments on the revised Phase II RI Work Plan (March 1993). Should you have any questions, feel free to contact me or Deborah Stockdale.

Sincerely,

ATLANTIC ENVIRONMENTAL
SERVICES, INC.



Barry Giroux
Project Manager

BG:js

cc: Deborah Stockdale - NORDIV
William Mansfield - NSB-NLON
Carol Keating - USEPA

**NAVY RESPONSES TO CONNECTICUT DEPARTMENT OF
ENVIRONMENTAL PROTECTION'S COMMENTS (March 24, 1993)
ON CBU AND OBDANE SECTIONS (March 1, 1993)
OF THE PHASE II REMEDIAL INVESTIGATION:
WORK PLAN, FIELD SAMPLING PLAN, QA/QC PLAN,
AND HEALTH AND SAFETY PLAN**

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.

This schedule has been revised to show CBU and OBDANE. The revised schedule is in the March 1993 draft of the Work Plan, Phase II Remedial Investigation.

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 I 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.

Total petroleum hydrocarbon (TPH) analysis will be specified for all samples listed in Table 7-3 (6 soil and 2 water).

- 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.

Is it your position that the 100 ppm you advocated is an ARAR for this site? That is, it is an applicable or relevant and appropriate requirement under Section 121 (d) of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA), 42 USC 9601 et. Req. If that is your position, please provide specific legal citation(s) to promulgated state law(s) or regulation(s) that support the standard.

In addition, please explain why each cited requirement is an ARAR at the site. This explanation should include one of two alternative positions. It should

explain how the requirement(s) specifically address a hazardous substance, pollutant, contaminant, or other circumstances under CERCLA. Or, in the alternative it should explain how the requirement(s) address problems or situations sufficiently similar to those at the site that their use is well suited to the site.