



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
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BOSTON, MASSACHUSETTS 02114-2023

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December 17, 2001

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

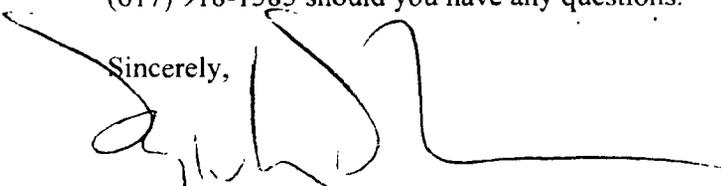
Re: Round 7 - Groundwater Monitoring Report for Area A Landfill at the Naval Submarine
Base New London - Groton Connecticut

Dear Mr. Evans:

EPA reviewed the *Round 7 Groundwater Monitoring Report for Area A Landfill* dated
November 2001. The following comments pertain to the discussion in the Navy's November 20,
2001 cover letter regarding laboratory reporting limits. A few minor discrepancies in the text of
the report are identified in Attachment A.

I look forward to working with you and the Connecticut Department of Environmental Protection
to complete the remedial action at the Area A Landfill. 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
Dick Conant, NSBNL, Groton, CT
Jennifer Stump, Gannett Fleming, Harrisburg, PA

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ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. 3-2, §3.0, ¶2	This text in this bulleted paragraph indicates that benzo(a)pyrene was detected at 1.0 ug/L in monitoring well 2WMW43DS. The September 2001 version of the report, however, does not reveal this detection even though the reporting limit was 0.5 ug/L. Please clarify.
p. 3-2, §3.0, ¶4	The discussion of chromium results implies that chromium was only detected in two wells. Based on Table 3-1, chromium was detected in 7 wells during the seventh round of sampling. In addition, the third sentence of this paragraph states: "All of the detected concentrations, with the exception of the concentration (9 J ug/L) detected in the unfiltered sample from 2WMW21S, exceeded the secondary monitoring criterion of 11 ug/L ..." This statement appears to conflict with the data presented in Table 3-1 that presents a number of positive detections in both filtered and unfiltered samples below the secondary monitoring criterion. Please review and correct this paragraph.
p. 3.3, §3.0, ¶1	The first sentence in this paragraph begins with: "Zinc was detected in 10 of 14 groundwater samples ..." Based on the data in Table 3-1, zinc was only detected in nine of the wells during the seventh round. Please review and correct as necessary.
Appendix F	<p>Within the November 20, 2001 letter, there is a discussion of reporting limits used by the laboratory. The letter indicates that the laboratory "...reported to generic Method Detection Limits (MDLs) for Polynuclear Aromatic Hydrocarbons (PAHs)" Please identify the reporting limits that were used for other parameters (<i>i.e.</i> metals, volatile organics, semivolatile organics other than PAHs, pesticides and PCBs).</p> <p>The letter also mentions that the laboratory provided instrument detection limits. Instrument detection limits represent a lower bound on actual sample specific detection limits. They are established by running standards in DI water and do not take into account effects from sample preparation or the sample matrix. Thus, although the IDLs may have been at or below the primary and secondary criteria, it does not follow that the sample detection limits were. The letter also states that "the laboratory corrected the data set by providing the Instrument Detection Limits (IDLs)." Please elaborate on what the laboratory did to "correct" the data.</p>

The response to EPA's October 11, 2001 comments seems to indicate that the laboratory, at the Navy's request, re-reported the data for PAHs to lower reporting limits. The organic data validation letters provided in Appendix F indicate that, in addition to the PAH data, the semivolatile and PCB data were not reported to the correct reporting limits. Please clarify this apparent discrepancy.