



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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October 21, 2003

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 12 Groundwater Monitoring Report for the Area A Landfill

Dear Mr. Evans:

EPA reviewed the *Round 12 Groundwater Monitoring Report for Area A Landfill*, dated September 2003, with particular attention to conformance to the Groundwater Monitoring Plan [1] and completeness of the execution and presentation. The report provides a brief review of the site history and documents results from groundwater and surface water sampling and analyses performed in April 2003. Detailed comments are provided in Attachment A.

The field and analytical activities summarized in the Groundwater Monitoring Report (GMR) generally follow the Groundwater Monitoring Plan [1]. The sampling in Round 12 followed the original scheme, and does not yet reflect adjustments discussed later in 2003 (e.g., reduction in the number of dredge-spoil wells off the toe of the landfill, addition of deep alluvium wells).

Qualitative review of the data raises no significant concerns with respect to contaminants from the site that may have impacted groundwater.

- Few SVOCs were detected. Phenanthrene was detected at 2WMW42DS at 7 micrograms per liter, above the primary monitoring criterion of 0.3 micrograms per liter. It is noted that no SVOCs were detected at this well in the previous three rounds.
- Total and dissolved arsenic were detected at concentrations at or above the primary monitoring criterion at 7 and 8 wells, respectively. All were dredged material wells, consistent with previous findings that this material is prone to low ORP and elevated metals concentrations.
- Total and dissolved lead were detected above the primary monitoring criterion at 2WMW47DS. Lead was not detected at this well in the previous three rounds.

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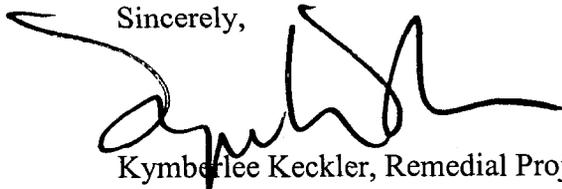
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- Zinc was detected in several surface water samples at concentrations above the primary criterion, consistent with past results. Copper and lead, which in the past were detected in exceedance of monitoring criteria, were not detected in surface water. However, it should be noted that the laboratory achieved detection limits for these elements of 10 micrograms per liter, below the primary, but above the secondary, monitoring criteria.

I look forward to working with you and the Connecticut Department of Environmental Protection to ensure that the Area A Landfill remedy remains protective of human health and the environment. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,



Kimberlee 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

ATTACHMENT A

<u>Page</u>	<u>Comment</u>
Table 3-1	Table 3-1 shows any analytical result that exceeds either the primary or the secondary monitoring criteria in boldface type. There is, however, no special notation reserved for cases where the detection limits achieved by the laboratory are above a particular monitoring criterion. As noted above, copper and lead were reported with detection limits of 10 micrograms per liter, while their secondary monitoring criteria are 4.8 and 1.2 micrograms per liter, respectively. Some notation should be found (<i>e.g.</i> , a gray background to the relevant cell; a footnote; <i>etc.</i>) to indicate that the analysis was unable to discriminate exceedances in these cases.
Appendix D	The field data sheets indicate stable purges were achieved at all wells. Turbidity was somewhat high in a few wells (<i>e.g.</i> , 2WMW39DS, at 30 NTU; 2WMW46DS, at 21 NTU). However, this is often inevitable in a silty environment such as the dredged material. It is noted that there is no obvious or consistent association of elevated turbidity with elevated metals (<i>e.g.</i> , 2WMW39DS, with the highest turbidity, showed no detections of any COPC, even in the unfiltered sample; 2WMW46DS, with the second highest turbidity, showed essentially no difference between filtered and unfiltered arsenic, detected at 18 and 19 micrograms per liter, respectively).

REFERENCE

- [1] Tetra Tech NUS, Inc., "Groundwater Monitoring Plan for Area A Landfill, Naval Submarine Base, New London, Groton, Connecticut," January 1999.