



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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NSB NEW LONDON  
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June 30, 2005

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: Volume II - Groundwater Monitoring Plan (revised from March 2003): Operation and Maintenance Manual for Installation Restoration Program Sites at the Naval Submarine Base - New London

Dear Mr. Evans:

EPA reviewed the "Operation and Maintenance Manual for Installation Restoration Program Sites at Naval Submarine Base - New London: Volume II - Groundwater Monitoring Plan," dated June 2005 with particular attention to the adequacy of changes to the manual in accord with previous review comments and replies, as well as agreements and discussions. The report details the proposed long-term monitoring plans for the Area A Landfill, the DRMO, the Goss Cove Landfill, and the Area A Downstream Watercourses and the Torpedo Shops (Sites 3 and 7). Detailed comments are provided in Attachment A.

All text changes discussed in the second round of Comments and Responses (dated August 8, 2003) are included in the revised O&M Plan. These include minor editorial changes, as well as deletions and additions for clarification.

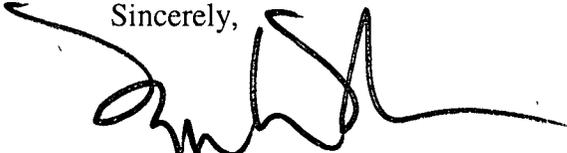
Succinct summaries of the proposed monitoring program for each site are lacking in the document, and the information given is not consistent from site to site. For Site 2 (Area A Landfill), the proposed monitoring wells and sampling frequency are given in the text (*see* page 2-26, §2.2.5.1). For Site 6 (DRMO), the monitoring wells are again listed in the text (*see* page 2-54, §2.3.5), and frequency is not stipulated. (Is the intent to continue on an annual basis, as described in §2.3.4.7 for Year 6?) For Site 8 (Goss Cove Landfill), proposed wells and frequency are specified in the text (*see* page 2-76, §2.4.5). For Sites 3 and 7 (Area A Downstream Watercourses and the Torpedo Shops), the proposed monitoring wells are tabulated both within the text (page 2-98, §2.5.5.1) and in a separate table at the end of the document (Table 2-16). Frequency is mentioned only in the text (page 2-99, §2.5.5.1). I strongly recommend that tables be constructed for each of the four sites, similar to that given for Sites 3 and 7 (Table 2-16), listing wells, analytes, and frequency. (Frequency is not given in Table 2-16 for Sites 3 and 7). This will serve a number of important purposes: (1) it will provide in summary form critical information on the overall scope of the proposed monitoring program for

all stakeholders; (2) it will present this information in a consistent manner for each site; (3) it will be an important management tool to support execution of the monitoring plan, insofar as it will provide Navy's contractor(s) with a "checklist" of monitoring obligations, without having to extract the details from the text.

The monitoring plan could benefit from a general provision for routine review of the monitoring coverage and frequency at each site, and allow for adjustments where the cumulative data indicate such are appropriate. Avoid language that is too restrictive, as in the enumeration of the "exit criteria" for Site 6, which states that compliance will be demonstrated by favorable results from "... at least four consecutive quarterly sampling periods." It appears that the monitoring frequency at this site is already reduced to annual, so that compliance must be redefined accordingly.

I look forward to working with you and the Connecticut Department of Environmental Protection to protect the environs of the Naval Submarine Base. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kymberlee Keckler', written over a horizontal line.

Kymberlee Keckler, Remedial Project Manager  
Federal Facilities Superfund Section

Attachment

cc: Mark Lewis, CTDEP, Hartford, CT  
Melissa Cokas, NSBNL, Groton, CT  
Jennifer Stump, Gannett Fleming, Harrisburg, PA

## ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. 2-54, §2.3.5	The monitoring frequency for Site 6 (DRMO) is not specified in the text, although it may be implicit that it is to start on an annual basis, continuing the current schedule ( <i>see</i> discussion of Year 6, page 2-53, §2.3.4.7). Please stipulate the proposed monitoring frequency in this section, and in a summary table ( <i>see</i> related General Comment).
p. 2-60, §2.3.7.1	Please note that the “exit criterion” for the DRMO is stated, “The average concentration of the compound in the plume is equal to or less than the applicable SWPC for at least four consecutive quarterly sampling periods...” According to §2.3.4.7, the DRMO is currently being sampled on an annual basis. Please ensure that the “exit criteria” for all sites are consistent with the proposed monitoring frequencies.
p. 2-98, §2.5.5.1	EPA expects that a round of monitoring for Sites 3 and 7 will be executed as expeditiously as possible, even in the event that the O&M Manual does not receive final approval in 2005. Groundwater at these sites has not been sampled in approximately five years, and it is imperative that characterization be ongoing.
Figures 2-3,2-8, 2-16, 2-22, & 2-23	These figures show <i>all</i> available and/or historical monitoring wells. While this is useful reference information, there are no figures in this document that indicate the locations of wells proposed for the <i>current</i> monitoring plan. Therefore, it is difficult for the reader to evaluate the proposed well coverage. It is suggested that a distinct symbol and/or color be used on these figures to distinguish wells proposed for continued monitoring as part of this Groundwater Monitoring Plan.