



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

June 13, 1994

Mark Evans, RPM
U.S. Department of the Navy
Northern Division
10 Industrial Highway
Code 1823, Mail Stop 82
Lester, PA 19113-2090

RE: Comments on the Supplemental Work Plan for OBDA/Area A
Downstream at the Naval Submarine Base-New London,
Groton, Connecticut

Dear Mr. Evans:

The purpose of this letter is to transmit EPA's comments on the subject document. If the amphibian survey is not done by the end of June the Navy has agreed to postpone this survey until next spring. However, if there is enough water in the ponds and streams to support the benthic invertebrate community, the bioassay and benthic invertebrate survey may be accomplished during July pending further discussion. The impact to the schedule will be discussed if and when a postponement takes place. The use of new contractors and the associated learning curve will not be sufficient reason for delay of this work.

We are still awaiting the work plan for supplemental work at the Area A Landfill. This work is not season dependent and should be done this summer in order to maintain the schedule.

If you have any questions regarding these comments, you should feel free to call me at (617) 573-5736.

Sincerely,

A handwritten signature in cursive script, appearing to read "Christine Williams".

Christine Williams, RPM
Federal Facilities Superfund Section

Attachment

- cc. Mark Leone, CT DEP
- Andy Stockpole, NLNSB
- Mary Sanderson, EPA
- Patti Tyler, EPA
- Rona Gregory, EPA
- Dan Winograd, EPA



amphibian survey

1. The survey should provide us with the number of organisms of each species and number of species seen. Please propose the specific methodology that you plan on using to accomplish this task for our review and discussion.
2. In an effort to obtain as much information as possible it is suggested to run the survey just before dark and overlap into darkness.

sediment bioassays section

1. It seems that there is some confusion with the term replicate and sample. A total of 3 discrete samples from each pond, the upper pond, the lower pond, the OBDA pond and the reference pond should be adequate. One from the upgradient end, the middle and the downgradient end.
2. In reference to the streams, I believe there is an inlet stream to the upper pond, an outlet stream from the upper pond, an outlet stream from the lower pond and an outlet from the OBDA pond. This section would imply only 1 stream is located in Area "A" downstream. Based on the size of the streams there should be 2 samples from the inlet stream to the upper pond, 2 from the outlet stream of the lower pond, 4 from the outlet stream of the upper pond and 3 from the outlet stream of the OBDA pond. Perhaps 2 or 3 from the yet to be named reference stream which should have a leafy, detrital substrate to compare with the outlet streams from the lower Pond and the OBDA wetland. The more easterly stream off Gungywamp Road better compares with the inlet stream to upper pond as both have gravelly substrate than does the westerly stream. Total of 26 samples.
3. Besides TAL/TCL we request TOC as well at least in the site ponds and streams for future use for equilibrium partitioning.
4. These site pond and site stream sample locations should be based on historical detection of high, medium and low DDTR concentrations in hopes of getting a gradient effect for cleanup level determination.
5. Please provide the name and the ASTM method number of the specific lab methodology, prior to taking the samples. (There is also an ASTM method for the collection, storage, characterization and manipulation of sediments for toxicological testing, ASTM E1-391).
6. Full decontamination must be performed in between each station if the samples are to be subjected to chemical analysis.

benthic invert survey section

1. Its suggested to take three composite samples consisting 5 replicates from each pond instead of the proposed 6 samples form each samples. One composite would be from the from the center of the ponds, one from the upgradient end of the ponds and one from the downgradient end of the ponds. These must be the same sample locations as the bioassay sample locations.
2. The last sentence in the first paragraph of this section is not consistent with the bioassay section. (see comment #2 above)
3. If at all possible, identification should be down to the species level, as implied in the last paragraph where one of the parameters to be examined is species richness.
4. Full decontamination must be performed in between each station if the samples are to be subjected to chemical analysis.
5. The specific methodology for the benthic invertebrate survey should be provided prior to performing such survey. (A rapid bioassessment may be used providing the level chosen is stringent enough to provide the information needed to obtain the goals of the study, such as EPA RBP 3.)