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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

April 10, 2006

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: Work Plan for Remedial Action at Sites 3 and 7

Dear Mr. Evans:

EPA reviewed the *Work Plan for Remedial Action at Site 3 and 7* for the Naval Submarine Base Superfund site in, Groton, CT, dated March, 2006. EPA focused its review on the completeness, technical accuracy, and consistency of the subject document. Detailed comments are provided in Attachment A.

Please supplement the work plan with groundwater contour maps for Sites 3 and 7 using the most recent water level data. Please also note in the work plan whether there are any significant seasonal variations in the groundwater flow pattern, if known.

The work plan does not include any monitoring wells downgradient of the leach field for Building 325. It would be appropriate to include such a well coupling in the vicinity of Building 281 (north of North Lake) to monitor for the same contaminants found in the vicinity of the septic tank.

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,

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

ATTACHMENT A

Page	Comment
p. 2-7, §2.5.5.1	The list at the bottom of the page does not include salinity, which is a required monitoring parameter, as identified in the text in this section and in the O&M Manual (Vol. II). Salinity should be considered in judging the completeness of purging.
p. 2-9, §2.5.5.3	Field blanks should also be collected to check source water for contamination.
p. 2-13, §2.5.9	Please spot check existing well elevations so the elevation data will be consistent between the existing and new wells.
Table 2-1	Please add a table note to indicate/confirm the vertical datum for the existing wells. Is it also NAVD 1988?
Table 2-2	To be consistent with the text in Section 2.5.5.1 and in the O&M Manual, Note 4 should also include salinity.
Table 2-3	To be consistent with the text in Section 2.5.5.1 and in the O&M Manual, Note 5 should also include salinity. Also, field blanks should also be collected to check source water for contamination.
Figure 1-4	Please check the well identification number for 7TMW1D. It is not consistent with the well ID in Table 2-1, which is 7MW1D. Based on Figure 2-29 in Volume II of the O&M Manual, which depicts the shallow potentiometric groundwater surface, it is not apparent that the groundwater flow direction is as depicted in Figure 1-4 for the areas south of Building 325. Consequently, the proposed well, 7MW13S, is not properly located to detect PAH contamination from the impacted soil area. Based on the apparent inconclusive groundwater flow pattern at the Torpedo shops, EPA recommends that at least two wells be monitored for PAH detection to ensure that the appropriate groundwater is monitored. Please review the new well location and the need for at least two wells (add 7MW6S or 7MW11S or a new well).
App. A, p. 7-1, §7.1.1	The text in this section and also in Table 5-1 indicates that a photoionization detector with an 11.7eV lamp will be used for air monitoring. However, Table 6-1 discusses relative responses for various

chemicals using a 10.2eV lamp. The response with an 11.7eV lamp is expected to be significantly different (lower) for these chemicals. Given that the action level for this work is 1 ppm above background (presumably to address benzene), it is not apparent that the monitoring instrument proposed is an appropriate choice, although the higher eV lamp would be required to detect methylene chloride. Please correct as appropriate.

The same comment applies to Attachment IV of Appendix A for the Safe Work Permits.

Appendix B, §7.0 — Please clarify the discussion in the third paragraph. According to Table 2-22 of Volume II of the O&M Manual, the laboratory is required to report to its instrument detection limits, which are expected to be lower than the CLP CRQLs. Please edit this section as appropriate to clarify the reporting requirement for consistency with the O&M Manual requirements.

Appendix B, Table 7-2 — The PQLs listed in this table are not consistent with the PQLs provided in Table 2-22 of the O&M manual. Please correct as appropriate.

It is also noted that Method 8310 identifies method detection limits in Table 1 and PQL factors in Table 2. The resulting PQLs for groundwater are significantly greater than the PQLs presented in the subject table. For example, the PQL for naphthalene in groundwater in 8310 is approximately 18 µg/L (1.8 µg/L x 10), but is 2 µg/L in Table 7-2. Please clarify the basis for the PQLs presented in Table 7-2.

Appendix B, §9.1.1 — For consistency, please correct the units for Specific Conductance to millimhos/cm. Note also that the *Groundwater Sample Log Sheet* in Appendix C uses Siemens rather than mhos (which we recognize are interchangeable units).

Appendix C — For the *Groundwater Level Measurement Sheet*, please include the datum used for the elevations reported.