



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203-0001

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October 29, 1997

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: Groundwater Monitoring Plan for the Defense Reutilization and Marketing Office

Dear Mr. Evans:

I am writing in response to your request for EPA to review the *Groundwater Monitoring Plan for Defense Reutilization and Marketing Office* ("GMP") dated October 1997. My review focused on the resolution of the comments identified in EPA's letter dated October 1, 1996. Detailed comments are provided in Attachment A.

In my letter dated October 1, 1996 (cover letter page 1, paragraph 3) I requested that the GMP indicate areas of groundwater discharge to the Thames River. The revised report does not appear to explicitly address this question. However, given the proximity of the site to the river, and the groundwater potential contours shown in Figure 3-1, it seems appropriate to regard the entire shoreline adjacent to the site to be a discharge area. This is implicit in the discharge calculations reported in Section 2.3.5, pages 2-24 to 2-25.

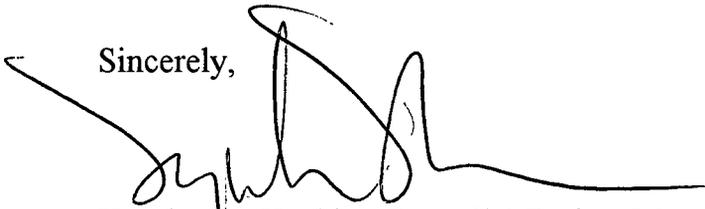
On page 3, paragraph 2 of the aforementioned letter I requested that analytical detection limits be listed, and specified that "...detection limits should be lower than respective monitoring criteria..." Analytical detection limits are provided in Appendix E, Table E-1 of the revised GMP. Many of the detection limits are higher than the monitoring criteria given in Table 5-1 (e.g., several SVOCs, pesticides, and inorganics). In these instances where the detection limits are higher than the monitoring criteria, non-detected analytical results would not be sufficient justification for discontinuing analysis for the contaminants in future sampling events. Please explain how you plan to demonstrate compliance with the monitoring criteria.



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I look forward to working with you toward completion of the DRMO ROD by the end of the calendar year. Please do not hesitate to contact me at (617) 573-5777 should you have any questions.

Sincerely,

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

Kymerlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: Mark Lewis, CTDEP, Hartford, CT
Andy Stackpole, NSBNL, Groton, CT
Patti Lynne Tyler, USEPA, Lexington, MA
Ken Finkelstein, NOAA, Boston, MA
Jennifer Hayes, Gannett Fleming, Harrisburg, PA
Corey Rich, Brown & Root, Pittsburgh, PA

ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. 4-1, §4.1.1, ¶2	First-year sampling has been changed from three times to four (<i>i.e.</i> , quarterly), as per the comment. The GMP proposes to review the data following the fourth quarterly sampling round, and if warranted, to seek regulatory-agency approval to reduce the sampling frequency to twice a year. The monitoring plan states that it is anticipated that the sampling will be continued for two years beyond the initial year of quarterly sampling. Due to the saturation of subsurface soils, a longer monitoring period may be warranted.
p. 4-2, Table 4-1	The comment refers to the detection limits for vinyl chloride. No modification to the table has been made in the revised GMP.
p. 5-9, Table 5-1	Although chemicals have been added to Table 5-1 pursuant to EPA's comment, Table 5-1 does not include all of the chemicals previously detected in groundwater and the chemicals detected in soils during the Phase II RI. Table 5-1 does not include carbon disulfide, benzoic acid, phenol, and bis(2-ethylhexyl)phthalate that were previously detected in groundwater. 1,4dichlorobenzene, previously detected in groundwater, was in the table in the draft version but has recently been omitted. Chrysene was detected in 68% of the Phase II RI subsurface soil samples and 66% of the surface soil samples; Anthracene was detected in 31% of the subsurface samples and 53% of the surface soil samples, yet they are not in Table 5-1. Please revise the GMP to include these chemicals.