



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 1  
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BOSTON, MASSACHUSETTS 02114-2023

February 23, 2000

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 6 Groundwater Monitoring Report for the Defense Reutilization and Marketing Office

Dear Mr. Evans:

EPA reviewed the *Round 6 Groundwater Monitoring Report for Defense Reutilization and Marketing Office*, dated January 2000. The report gives a review of the site history and previous investigations, a description of field activities involved in the sixth round of monitoring, and results of sampling and analysis from the October 1999 sampling. EPA reviewed the report in light of the Groundwater Monitoring Plan, the execution of the sampling round, and the completeness of the documentation. Detailed comments are provided in Attachment A.

The field activities and laboratory analyses summarized in the Groundwater Monitoring Report (GMR) generally follow the Groundwater Monitoring Plan. The monitoring program appears to be proceeding routinely.

The GMR appears complete. It provides an archive of data accumulated in Round 6 sampling and analysis, including the field parameters (Appendix E) and the laboratory data sheets (Appendix G).

The report offers no interpretation of the data, as per the Monitoring Plan, which calls for quarterly data reporting, with interpretation vis-a-vis the evolution of the site conditions deferred to annual reports. The quarterly data report does provide a comparison to the monitoring criteria adopted in the Groundwater Monitoring Plan, and exceedances of primary and secondary monitoring criteria are noted.

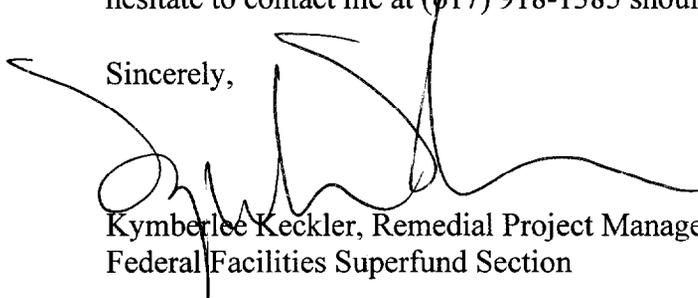
A qualitative overview of the data from the Round 6, as well as data from previous rounds, indicates no new concerns with respect to groundwater quality. It appears that the soil removal and cap continue to be effective in limiting impacts to groundwater. There are no exceedances of the primary monitoring criteria. There are a few exceedances of the secondary monitoring criteria, but none suggest significant trends of concern. (We note that one of the few increases of

a compound above its secondary criterion is shown by zinc in 6MW11S, which went from non-detect (13 µg/L U) in Round 5 to 92.4 µg/L in Round 6. This is not a cause for concern at this time.)

To repeat a comment offered in reviews of previous rounds of monitoring data, it appears that the few persistent exceedances of monitoring criteria are for arsenic and copper. It is again urged that this phenomenon be addressed in the annual report, with particular attention to developing a conceptual model for the mobility of inorganic constituents in the site groundwater. What controls redox conditions at the site, as well as base wide in the region along the Thames shoreline? What are the natural (*e.g.*, organic-rich, estuarine sediments) and anthropogenic (*e.g.*, landfill leachates) influences?

I look forward to working with you and the Connecticut Department of Environmental Protection to protect the environment of the Defense Reutilization and Marketing Office. 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  
Darlene Ward, NSBNL, Groton, CT  
Jennifer Stump, Gannett Fleming, Harrisburg, PA  
Matt Bartman, Tetra Tech-NUS, Pittsburgh, PA

## ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. 2-1, §2.1	<p>As noted in comments on previous rounds of the sampling, the contouring of the high-tide and low-tide groundwater levels is somewhat difficult to rationalize against expectations in the tidally influenced groundwater environment. This may be due principally to the sparse data available from the array of shallow monitoring wells and conventional interpolation schemes used to draw the contours. Some attention should be devoted to developing a general understanding of the tidal influence on the groundwater flow beneath the site in the annual report. In this regard, it is noted that the field data sheets (Appendix C) indicate that the expectation seems to be that wells 6MW6S, 6MW6D, and 6MW9S are not tidally influenced. This seems to be contradicted by the data (<i>e.g.</i>, Table 2-1), which show lower water levels for all of these wells at low tide, with the most striking difference at 6MW9S, the farthest inland (approximately 200 feet) of all wells on the flat area adjacent to the estuary.</p>