



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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April 23, 2002

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: Year 3 Groundwater Monitoring Report for the Defense Reutilization and Marketing Office

Dear Mr. Evans:

EPA reviewed the *Year 3 Annual Groundwater Monitoring Report for Defense Reutilization and Marketing (DRMO)* dated March 2002. The report is a modified version of the preceding draft report dated November 2001, and incorporates changes in response to EPA comments on the draft. The document summarizes data collected in the third year of monitoring (Rounds 9 (July 2000) through 12 (June 2001)), provides comparisons of analytical results to cleanup standards and background, assesses the results with respect to potential site impacts, and puts forward recommendations for the continued monitoring program. The revised report was reviewed with particular attention to the adequacy of the changes made to address the concerns identified in the Comment - Response process. Detailed comments are provided in Attachment A.

The Response to Comments (General Comment 4, Appendix D) states that background concentrations will be included in Table 4-1 to serve as another reference to compare analyses from site monitoring wells. This has been done, and provides a useful perspective, particularly where the secondary monitoring criteria are very low (e.g., below laboratory detection limits). The Response states that a discussion of the limitations of the secondary criteria will be included in section 4.1, but it is not apparent that this has been done.

I look forward to working with you and the Connecticut Department of Environmental Protection to complete the remediation at the DRMO. 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

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Attachment

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

ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. 2-8, §2.3.5	The changes discussed in the Comment/Response (Specific Comment 2) with regard to the "consistency" of a significant difference in arsenic concentration from upgradient to downgradient with a downward trend in concentrations in the downgradient wells are incorporated in the revised text.
p. 4-1, §4.1	The anomalous arsenic detection at 6MW11S in Round 12 appears to be an anomaly. The determination that the result should be reported in Table 4-1 is appropriate. The anomaly is discussed in the text (p. 4-2, sec. 4.1) as stated in the Response to Comments (Specific Comment 3).
p. 4-3, §4.3	The proposed statistical tests address the concerns raised in previous review comments with regard to tests for the applicability of parametric and non-parametric ANOVA. The more complete analysis appears to be correctly applied; the conclusions are essentially the same as with the prior scheme. A follow-up comment noted that, under the reduced monitoring plan proposed, the data quantity will be insufficient to support ANOVA. The response (Appendix D) proposes to use the Mann-Kendall test to identify trends in this event. This is an appropriate method. The response also proposes that regression analysis will be used, apparently to extrapolate trends into the future to identify the time of probable exceedances. The usefulness of the regression analysis is unclear, as extrapolation based purely on empiricism seems unlikely to yield meaningful results. Extrapolation based on an appropriate transport model would have a sounder basis. In the absence of such an approach, a qualitative judgment of when exceedances appear to be imminent should suffice to trigger discussion of the appropriate response.