



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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BOSTON, MASSACHUSETTS 02114-2023

June 6, 2003

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: Responses to USEPA's February 24, 2003 Comments on the Draft Year 4 Annual
Groundwater Monitoring Report for the DRMO

Dear Mr. Evans:

EPA reviewed the above-named document for the adequacy of the responses in addressing the concerns raised in the original review. Further comments are offered only on items for which issues remain or clarification is needed. The numbering as presented in the responses is retained.

The original general comment 2 identified unclear *logic* behind the statement that "... the DRMO site is not causing the leaching of metals." The comment did not challenge the overall conclusion that DRMO has a minimal impact on inorganics in groundwater. The response notes that the argument as presented was extracted from an historic document, the Year 3 Annual Report, and, therefore, modifications to the present report are not required. However, if an error was overlooked in the previous report, it should not be repeated here. Again, the *conclusions* of the previous report were correct (i.e., the data do not indicate significant site impacts to metals concentrations in groundwater); it is only this particular rationale that is not clear. Future reports should provide a defensible review of the interpretation and implications of past monitoring results, regardless of how these were presented in the older reports.

The original general comment 5 observed the apparent increase in Cr and Pb from upgradient to downgradient wells, noting, in particular, that there may be an association of the metals detections with slightly elevated turbidity under oxidizing conditions. While the response correctly indicates that Cr and Pb are not in exceedance of the monitoring criteria or background, it is emphasized that it is *Navy's* statistical analysis that identified the apparent increase in Cr and Pb across the site, thus calling for further consideration. It would seem that, if the statistical analyses "flag" a potential site impact, it is worthwhile to look more closely at the data for an interpretation. In this particular case, the closer look offers an explanation that exonerates the DRMO.

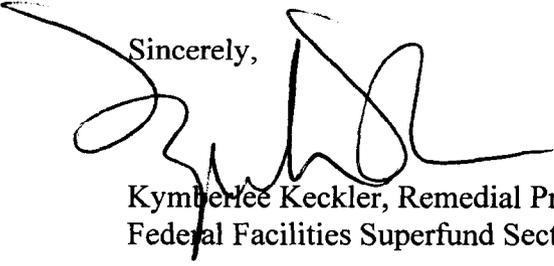
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I look forward to working with you and the Connecticut Department of Environmental Protection to protect the environs of the DRMO. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kymberlee Keckler', written over the word 'Sincerely,'.

Kymberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

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