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

October 3, 2005

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: Draft Closeout Report for the Torpedo Shops Soil, Operable Unit 8

Dear Mr. Evans:

EPA reviewed the *Draft Closeout Report for Pre-Remedial Study* at Torpedo Shops, Operable Unit 8 - Site 7 for the Naval Submarine Base-New London Superfund Site in Groton, CT dated September 15, 2005 in light of its completeness, technical accuracy, and consistency. Detailed comments are provided in Attachment A.

It is not appropriate to refer to this report as a closeout report. Consider changing the name to a completion report for the pre-remedial study.

No sample has apparently been collected from the septic tank as required by the work plan in Section 1.3. Since a sample was not collected, the implication is that Navy intends to remove the septic tank. Please confirm that the septic tank will be removed or explain why no sample was collected.

EPA had previously requested that field data be collected to determine the depth of the septic tank below grade so the sampling data could be correlated with the details of the septic tank. The subject report does not indicate that any information regarding the configuration of the septic tank was collected during this investigation. Please edit the report to indicate what measurements were collected, if any, relative to the septic tank configuration.

Contaminant concentrations that exceed the cleanup goals were detected at the bottom of the borings in the vicinity of the septic tank. Consequently, this investigation has not identified either the vertical or horizontal extent of contamination exceeding the cleanup goals in the vicinity of the septic tank.

The report does not indicate if a survey of the sampling points has been completed, as was required by the Sampling Plan. Please edit the report to clarify if the survey work was done or specify when it will be completed.

The Final Sampling Plan required waste characterization of the investigation-derived waste by TtEC plus disposal coordination and indicated that a five-day turn around time would be used. However, the subject report states in Section 2.4 that the Navy will now characterize and dispose the waste. Please confirm this change from the Final Sampling Plan, indicate when the waste will be characterized and disposed, and whether the analytical results will be provided in the final version of the report.

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
Melissa Cokas, NSBNL, Groton, CT
Jennifer Stump, Gannett Fleming, Harrisburg, PA

ATTACHMENT A

Page	Comment
p. 5, §3.1	Clarify the discussion by presenting the second paragraph first and the first paragraph second. Edit to refer only to PAH samples.
p. 5, §3.1	The last paragraph states that QA/QC samples were collected according to the approved Final Sampling Plan (FSP); however, review of the information presented in the subject report indicates that this is not correct. The FSP required: · Daily field blank samples · Two rinsate blank samples · A trip blank sample with each VOC shipment, and immediate shipment to the laboratory for preservation, and · A temperature blank sample with each cooler shipped Table 2 only lists one rinsate blank, one trip blank, and no field blanks, and there is no discussion in the report of temperature blanks being used. Samples were collected over a two-day period so two field blanks and at least two trip blanks should have been collected. Review of the laboratory reports indicates that one rinsate blank sample was apparently broken (please verify). Please revise the subject report to discuss the deviations from the FSP regarding the QA/QC samples and the impact that this has on the data quality.
Table 2	The description for sample NSBNLON-SITE-07-04-2.5-3.0 states that refusal was encountered at a six-foot depth. If this is correct, please clarify why this sample interval is listed as 2.5-3.0 rather than 2.5-5.0. Also, it appears from the data that the intention was to collect all samples down to a depth of five feet, so why was the above boring continued to six feet? Were soil cores generally collected in five-foot intervals? Please clarify why boring NSBNLON-SITE 7-06 was moved six feet west and re-bored as NSBNLON-SITE 7-06A after collecting the soil core from the original location. Why was no laboratory sample collected from the original boring for analysis, since it had a much greater PID reading than the relocated boring? Please clarify why borings NSBNLON-SITE 7-12-2.5-4.5 and NSBNLON-SITE 7-13-2.5-4.0 did not extend to a full five feet. Does the reduced length indicate that recovery was less than 100%? No mention of refusal was made in the description column.
Appendix D	For the laboratory data sheets, the field sample ID for Lab sample ID 54646-14 is incomplete (*e.g.*, pdf page 498); however, this is the number provided to the laboratory on the Chain of Custody Form. Please make sure the analyses for this sample are associated with the correct field sample ID.