



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203-0001

September 19, 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

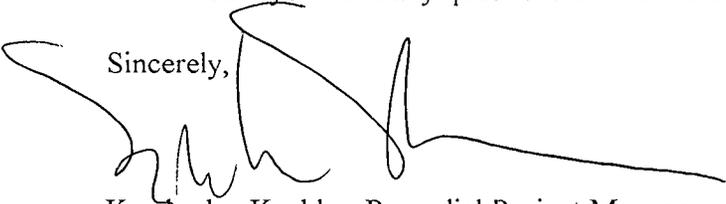
Re: Data Gap Investigation Report for the Goss Cove Landfill

Dear Mr. Evans:

EPA reviewed the *Data Gap Investigation Report, Goss Cove Landfill, Naval Submarine Base New London, Groton, Connecticut* dated August 1997. Our review focused on the response to comments provided in your letter dated June 10, 1997 and the resolution of the EPA comments that were presented in the July 28, 1997 letter to the Navy. It should be noted that several of the outstanding comments were considered closed based on the fact that additional groundwater investigations are to be conducted as part of a base-wide evaluation of groundwater noted in the June 10, 1997 Navy response to EPA comment letter and the July 29, 1997 EPA letter regarding the Base-wide Groundwater Remedial Investigation Data Needs at the Naval Submarine Base in Groton, CT. Detailed comments are provided in Attachment A.

I look forward to working with you and the Connecticut Department of Environmental Protection toward the cleanup of the Goss Cove Landfill. Please do not hesitate to contact me at (617) 573-5777 should you have any questions or wish to arrange a meeting.

Sincerely,



Kimberlee 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
Jennifer Hayes, Gannett Fleming, Harrisburg, PA
Corey Rich, Brown & Root, Pittsburgh, PA

ATTACHMENT A

<u>Page</u>	<u>Comment</u>
Figures 2-1, 2-2, 3-2, & 3-3	These figures have been redrafted (dated 8/3/97), and include at least partial information regarding the bedrock outcrops. Figure 2-2 shows two areas of outcrop, one west of the base gate, and one south of the dry cleaner's shop (outside the base boundary). However, Figures 2-1, 3-2, and 3-3 do not show the second of these two outcrops. Insofar as these two outcrops have a major influence on the local groundwater flow, placement of monitoring wells and test borings, and potential transport mechanisms for DNAPL, they are quite important to the maps. Also, it was requested that the bedrock surface be contoured on at least one map. This has not been done.
Figures 1-5& 1-8	I note that the added cross section, C-C', provides a useful interpretation of the bedrock surface in the critical area through 8MW10S, 8MW9S, 8MW8D, and 8MW8S. However, there is an inconsistency between the locations of 8MW10S and 8MW9S on the map (Figure 1-5) and the cross section (Figure 1-8). The map shows 8MW10S southeast of 8MW9S, while the cross-section shows 8MW9S southeast of 8MW10S. Other maps in the report (e.g., Figs. 2-1, 2-2, 3-2, 3-3) are consistent with the presentation on the cross section (Figure 1-8).
Figures 1-5 & 1-6	There is a discrepancy between the locations of 8MW6D and 8MW6S on Figures 1-5 and 1-6. It appears on the map (Figure 1-5) that 8MW6D is north of 8MW6S, while on the cross-section (Figure 1-6) 8MW6S is north of 8MW6D.
p. 3-10, ¶2	The comment asked for a discussion of PCE transport as DNAPL. This was done in the revised text however, the second paragraph on page 3-10 should be revised to state that maximum detected concentrations of PCE are <i>greater than</i> 1 percent of the solubility of that compound in water.
p. 3-13, ¶3	Change "CPE" to "PCE."
p. 4-1, §4.2	The comment suggests caution regarding the direction of contaminant migration. The text (p. 4-1, §4.1, bullet 3) states that "... PCE ... is migrating onto the Goss Cove Landfill Site from a southeasterly direction..." While this conclusion is suggested strongly by the data for wells 8MW9S, 8MW10S, 8MW8S, and 8MW8D, the direction of transport is not established unequivocally and requires further support (Deeper wells in the tank farms are one of the data needs). The base-wide evaluation of groundwater should resolve this issue. Revise the first sentence to state that "currently it appears" PCE is migrating onto the Goss Cove Landfill site from a southeasterly direction and note planned sampling efforts.