



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203-0001

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NSB NEW LONDON
5090.3a

April 21, 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: Existing Data Summary Report for Lower Subbase Remedial Investigation

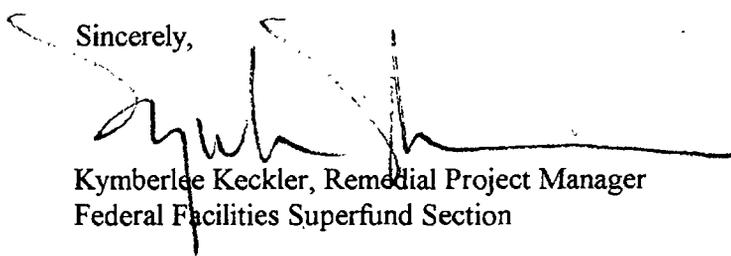
Dear Mr. Evans:

I am writing in response to your request for EPA to review the *Existing Data Summary Report for Lower Subbase Remedial Investigation* dated March 1997. EPA reviewed this document in light of its responsiveness to EPA's February 6, 1997 letter and the responses provided on March 26, 1997. I am pleased that the majority of the comments have been addressed through revisions to the *Existing Data Summary Report* or are addressed through the *Draft Work Plan and Sampling and Analysis Plan for Lower Subbase*. Although there are no outstanding issues that demand revising the *Existing Data Summary Report*, many of the issues need to be resolved in the remedial investigation and should be incorporated into the *Work Plan and Sampling and Analysis Plan for Lower Subbase*. Detailed comments are provided in Attachment A.

Please refer to EPA's comments on the *Draft Work Plan and Sampling and Analysis Plan for Lower Subbase* in reference to the resolution of the following comments: General comments 2, 3, 6, & 12; and page 2-10, §2.4.1 (10).

I look forward to working with you and the Connecticut Department of Environmental Protection toward the cleanup of the lower submarine base area. Please do not hesitate to contact me at (617) 573-5777 should you have any questions.

Sincerely,


Kimberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment



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cc: Mark Lewis, CTDEP, Hartford, CT
Andy Stackpole, NSBNL, Groton, CT
Patti Lynne Tyler, USEPA, Boston, MA
Jennifer Hayes, Gannett Fleming, Harrisburg, PA
Matthew Cochran, Brown & Root, Pittsburgh, PA

ATTACHMENT A

EPA Comment

Review of Response/Revision

General Comment 4

Please refer to EPA's comments on the Draft *Work Plan and Sampling and Analysis Plan for Lower Subbase* regarding sediment and surface water sampling and a tiered approach to biotic sampling.

General comment 7

EPA recommended that source areas, preferential flow pathways, and **existing** sampling data be correlated to identify data gaps. It is important for data gaps to be thoroughly identified so that the sampling plan approach will collect sufficient data. I trust that this issue will be resolved in the *Work Plan and Field Sampling and Analysis Plan*.

General Comment 8

Tables for each zone that include all existing parameters such as soil permeability, soil texture, and free product thickness are not included in the existing data summary report. The Navy's response agrees that summary tables of appropriate parameters would make identification of data gaps easier but states that these tables will not be included until the Lower Base RI report. The tables should be included either with the *Existing Data Summary Report* or the *RI Work Plan* instead of the RI report so that they may help identify data gaps before the remedial investigation is complete.

p. 2-10 *et seq.*, §2.4 (9)

Please refer to EPA's comments on the Draft *Work Plan and Sampling Analysis Plan for Lower Subbase Remedial Investigation, Naval Submarine Base New London* regarding sediment and surface water sampling and a tiered approach to biotic sampling.

Drawing 1 (23)

Data presentation will be resolved by the collection of additional samples in Zone 5 during the remedial investigation. EPA questioned the presentation of the limited data in Zone 5 since the validity of predicting a trend by using only one sampling data point is uncertain. Also, the response appears to incorrectly indicate that the other data points were obscured. The Zone 5 TPH isoconcentration depicted on Drawing 1 only has one shallow soil sample in its data set.