



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

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

February 2, 1999

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: Review of the Navy Responses dated December 18, 1998 to USEPA's November 16, 1998 Letter regarding the Draft Final Remediation Investigation Report for the Lower Subbase at the Naval Submarine Base - New London, Groton, Connecticut

Dear Mr. Evans:

EPA reviewed the *Navy Responses dated December 18, 1998* to USEPA's November 16, 1998 Letter regarding the *Draft Final Remediation Investigation Report for the Lower Subbase* dated October 1998. The responses were reviewed for technical sufficiency, adherence to the NCP, EPA guidance, and generally accepted practice. Overall, I am pleased that the majority of EPA's comments have been adequately addressed. Detailed comments are provided in Attachment A.

I look forward to working with you and the Connecticut Department of Environmental Protection on the cleanup of the Lower Submarine base. 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

Attachment

cc: Mark Lewis, CTDEP, Hartford, CT
Jeff Sullivan, NSBNL, Groton, CT
Patti Lynne Tyler, USEPA, Lexington, MA
Ken Finkelstein, NOAA, Boston, MA
Jennifer Stump, Gannett Fleming, Harrisburg, PA
Corey Rich, Tetra Tech-NUS, Pittsburgh, PA

ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. 1, CL 5	The Navy agreed to further characterize the sediment of the Thames River in Zones 4 and 7. The Navy proposed to complete the additional sampling and analysis activities during the Feasibility Study as part of a Data Gap Investigation. This approach is acceptable. Further discussions between the Navy, EPA, CTDEP and NOAA to discuss the objectives and scope of the sampling effort are necessary.
p. 1, GC 3	The concern expressed in the original comment is that assertions regarding lead mobility are essentially "conceptual" in nature, and, while plausible, are not backed up by extensive, site-specific geochemical data. Navy acknowledges this in the response to comments, and states, "If a decision for remedial action will be based on the proposed conceptual model, the additional data will be required to support the model." This is an appropriate response. EPA notes, however, that this commitment is not reflected in the revised text of the RI. Rather, it is on record only in the response to comments. The Navy is responsible for additional sampling should it be necessary.
p. 4, SC 1	The original comment simply noted that the K_{oc} values given in Table 3-3 remain the same as in the original draft report, and the citation (USEPA, 1982) remains the same, as well. In contrast, section 3.5.3.2 discusses the <i>calculation</i> of K_{oc} values from an empirical correlation with K_{ow} (octanol/water partition coefficient). This appears to be unchanged from the original also. The RI should be clear. Are the K_{oc} values in Table 3-3 indeed "literature values" (<i>see</i> §3.3.1, p. 3-16) from USEPA, 1982, as stated? If so, are these values used in any of the assessments reported in the RI? If the K_{oc} values shown in Table 3-3 are <i>not</i> used, but are set aside in favor of calculated values based on K_{ow} (<i>see</i> §3.5.3.2, p. 3-77), then perhaps the calculated K_{oc} values should be given in Table 3-3. What K_{oc} values were used in what assessments, and are the assessments and the reporting complete and internally consistent?
p. 5, SC 2	The original comment and the follow-up noted that a conclusion was drawn concerning lead transport ("... lead does not appear to be migrating with groundwater ..."), the basis for which was not stated clearly in the text. Navy agrees to qualify the conclusion "as suggested." The "qualification" should not only acknowledge that the inference is tentative because of sparse data, but also provide the rationale behind the conclusion. For example, if the inference is drawn from inspection of a contour map, this should be stated explicitly.
p. 7, SC15	The information provided in the responses should be incorporated into the revised human health risk assessment.